

SEP 24 2010

U.S. DISTRICT COURT  
WESTERN DISTRICT OF NC

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
Civil Case No. 3:10-CV-137

JACK STRATTON, SOLOMON STRATTON,

Plaintiffs,

vs.

UNITED STATES DEPARTMENT OF HEALTH AND  
HUMAN SERVICES, UNITED WAY OF CENTRAL  
CAROLINAS, FOUNDATION FOR THE  
CAROLINAS, COUNCIL FOR CHILDREN'S RIGHTS,  
BRETT LOFTIS,MARTHA CURREN, DAVID CAYER, YVONNE  
MIMS-EVANS, ELIZABETH MILLER-KILLEGREW,  
MARGARET SHARPE, SIDNEY EAGLES, JOHN  
MARTIN, MARTHA GEER, PATRICIA TIMMONS-  
GOODSEN, in their personal capacities;  
MECKLENBURG COUNTY, RICHARD JACOBSEN,  
TYRONE WADE, TWYLA HOLLINGSWORTH,  
DONNA FAYKO, GRETCHEN CALDWELL, SHERRI  
GLENN, DAVID FEE, LISA LOOBY, SUSAN  
MILLER, KATHERINE DORMINEY, ROBERT  
ADDEN, RICHARD LUCY, in their personal capacities  
MICHAEL SCHMIDT, CAROLINAS HEALTHCARE  
SYSTEM,

Defendants

**PLAINTIFFS' FIRST  
AMENDED VERIFIED  
COMPLAINT****Trial by Jury Demanded**

Plaintiffs Jack Stratton and his son Solomon Stratton, pro per, bring this original,  
independent action for damages and for declaratory and injunctive relief.

**NATURE OF THE CASE**

1. This original independent action arises under common law and 42 USC § 1983; 42 USC 1985; 18 USC §§ 1581-1595 (Slavery and Involuntary Servitude); 18 USC § 1964 (RICO); 42 USC 2000bb, et seq. (Religious Freedom Restoration Act); Title VI of the Civil Rights Act of

1964 as amended at 42 USC § 2000d et. seq.; 28 USC § 1367 (Supplemental).

2. This original, independent action is in the nature of a common law bill in equity arising directly under the Due Process Clause of the 14th Amendment and North Carolina common law to vacate and enjoin the operation and enforcement of certain alleged "state court judgments" as void ab initio, unconstitutional, and the product of conspiracy, extrinsic fraud, and fraud upon the court.

3. This is a constitutional challenge, facially and as applied, to P.L. 93-247, the Child Abuse Prevention and Treatment Act (CAPTA)(1974) and all its amendments, including the Child Abuse Prevention and Treatment Act Amendments of 1996 (P.L. 104-235, 10/3/96, and to the federal and state policies, practices, and procedures used in the implementation of "child protective services" as set forth herein.

4. This is a constitutional challenge, facially and as applied to the North Carolina Juvenile Code in its entirety [North Carolina General Statutes, Chapter 7B] and to specific sections of the Code, as set forth herein.

5. This is a constitutional challenge, facially and as applied, to Mecklenburg County and the Mecklenburg County District 26 Court policies, practices, and procedures pursuant to the implementation of NCGS Chapter 7B ("child protective services").

6. This is a constitutional challenge to certain Mecklenburg County policies, practices, and procedures used in the application and implementation of NCGS Chapter 35A [Guardianship], as set forth herein.

7. This is a constitutional challenge to federal and state "domestic violence" programs and the policies, practices, and procedures used in their implementation, as set forth herein.

8. Pursuant to 42 USC § 2000d-7, the State of North Carolina by its acceptance of federal

funds has waived 11th Amendment sovereign immunity on Title VI civil rights claims.

9. This original, independent action arises from continuing wrongs perpetrated in furtherance of a continuing criminal and civil conspiracy, as set forth herein.

### **JURISDICTION AND VENUE**

10. Original district court jurisdiction is invoked under 28 USC § 1331, 18 USC § 1964(a)(c), 42 USC § 2000bb(1), 18 USC §1595, and 28 USC § 1367.

11. Venue is proper pursuant to 28 USC § 1391(b). Plaintiff and the majority of Defendants reside in the district and Plaintiff's claims arise from acts perpetrated in the district.

### **PARTIES**

12. Plaintiffs Jack Stratton and Solomon Stratton are father and son who reside in the Western District of North Carolina. (PO Box 480466, Charlotte, NC 28269).

13. Defendant North Carolina Department of Health and Human Services is a federal agency (200 Independence Ave, S.W., Washington, D.C., 20201).

14. Defendant United Way of Central Carolinas is a 501(c)(3) non-profit corporation (301 South Brevard Street, Charlotte, NC 28202).

15. Defendant Foundation for the Carolinas is a 501(c)(3) non-profit corporation (217 South Tryon Street, Charlotte, NC 28202).

16. Defendant Council for Children's rights is a 501(c)(3) non-profit corporation (601 East Fifth Street, Charlotte, NC 28202).

17. Defendant Brett Loftis is the Director of the Council for Children's Rights (601 East Fifth Street, Charlotte, NC 28202).

18. Defendant Martha Curren is Clerk of Court for Mecklenburg County, NC (832 East Fourth Street, Charlotte, NC 28052).

19. Defendant David Cayer is a Federal Magistrate Judge for the Western District of North Carolina (2715 Roswell Ave., Charlotte, NC 28209).
20. Defendant Yvonne Mims-Evans is a Mecklenburg County Superior Court Judge (1020 W. First Street, Charlotte, NC 28202).
21. Defendant Elizabeth Miller-Killegrew is a former Mecklenburg County District Court Judge (601 East Fifth Street, Charlotte, NC 28202).
22. Defendant Margaret Sharpe is a former Forsyth County District Court Judge (844 Glen Echo Trail, Winston Salem, NC 27106).
23. Defendant Sidney Eagles is a former judge for the N.C. Court of Appeals (1301 Glen Eden Dr., Raleigh, NC 27612).
24. Defendant John Martin is Chief N.C. Appeals Court Judge (1301 Glen Eden Dr., Raleigh, NC 27612).
25. Defendant Martha Geer is a N.C. Appeals Court Judge (227 Fayetteville St., Raleigh, NC 27601).
26. Defendant Patricia Timmons-Goodsen is a N.C. Supreme Court Justice (2 E. Morgan St., Raleigh, NC 27601).
27. Defendant Mecklenburg County is a municipal corporation (600 East Fourth Street, Charlotte, NC 28202).
28. Defendant Richard Jacobsen is former Mecklenburg DSS Director (11006 Stonepath Ln., Charlotte, NC 28277).
29. Defendant Tyrone Wade is Deputy Mecklenburg County Attorney (600 East Fourth Street, Charlotte, NC 28202).
30. Defendant Twyla Hollingsworth is a Mecklenburg County DSS Attorney (600 East Fourth Street, Charlotte, NC 28202).

31. Defendants Donna Fayko, Gretchen Caldwell, Sherri Glenn, David Fee, Lisa Looby, are Mecklenburg County DSS Supervisors (600 East Fourth Street, Charlotte, NC 28202).
32. Defendant Susan Miller is a Mecklenburg County DSS social worker (600 East Fourth Street, Charlotte, NC 28202).
33. Defendant Katherine Dorminey is a former Mecklenburg County DSS Supervisor (600 East Fourth Street, Charlotte, NC 28202).
34. Defendant Robert Adden is a DSS Attorney (831 E. Morehead St., Suite 860, Charlotte, NC 28202).
35. Defendant Richard Lucy is an attorney for Catholic Social Services of the Diocese of Charlotte (1123 South Church Street, Charlotte, NC 28203).
36. Defendant Michael Schmidt is an attorney in Laurinburg, NC (10322 Stewartsville Cemetary Rd., Laurinburg, NC 28352)
37. Defendant Carolinas Healthcare System is a private corporation (1000 Blythe Blvd., Charlotte, NC 28203).

## **INTERNATIONAL LUCIFERIAN CHILD TRAFFICKING CRIMINAL ENTERPRISE**

### **Rothschilds and the Illuminati**

38. The Rothschild banking empire was first established by Mayer Amschel Rothschild in 1744 in Frankfurt, Germany.
39. Rothschild and his sons took over The Bank of England and set up central banks in other major European countries.
40. The Rothschilds eventually took over the entire European banking system.
41. The Rothschilds are a family of intergenerational Luciferians (Satan worshippers). This fact has been established by hard evidence set forth by dozens of experts and investigators,

including but not limited to:

- (a) English professor John Robison in his 1798 book *Proofs of a Conspiracy Against All the Religions and Governments of Europe*
- (b) Canadian Naval Commander William Guy Carr in his 1958 book *Pawns in the Game*
- (c) Former Los Angeles FBI Special Agent in Charge Ted Gunderson, currently exposing the conspiracy around the world and recognized by the courts as an expert witness on Satanism.

42. In 1770, Mayer Amschel Rothschild drew up plans for a secret Luciferian conspiracy to take over the world.
43. Rothschild hired a former Catholic priest and fellow Luciferian named Adam Weishaupt to carry out the plot. Rothschild and Weishaupt were both violently anti-Christian.
44. Weishaupt infiltrated the Masonic Lodges of Europe and secretly recruited individuals to carry out the Luciferian plan of world domination.
45. On May 1, 1776 Weishaupt established the Luciferian plot as the *Illuminati*, also called the *Order*. Weishaupt gave himself the Illuminati code name *Spartacus*.
46. The primary method used by the Illuminati conspiracy was secrecy. Weishaupt stated: "The great strength of our Order lies in its concealment; let it never appear in any place in its own name, but always covered by another name, and another occupation".
47. Illuminati conspirators were secretly placed in high places in every important fact of life, including government, education, and publishing houses.
48. In 1785, an Illuminati conspirator named Lanz was carrying secret documents from Bavaria to the Grand orient Lodge in Paris France when he was struck and killed by lightning.
49. The Bavarian government, realizing the danger to the government posed by a secret society organized to overthrow the government, banned the Illuminati and seized its papers.
50. The Illuminati went underground and continued to secretly operate.

51. Rothschild control of the issuance of money allowed the Rothschilds and the Illuminati to systematically take over and control the governments of Europe. Mayer Amschel Rothschild had stated: "Give me control of a nation's money supply and I care not who makes the laws."

52. After the American Revolution, the Rothschilds attempted for over one hundred years to take over the United States government through permanent establishment of a U.S. central bank.

### **Rothschilds and the Illuminati Take Over the United States**

53. On November 22, 1910, Rothschild agents and others in the United States met secretly at Jekyll Island in Savannah, Georgia for purposes of setting up a central bank in the United States.

54. Those present at the secret meeting included banker John P. Morgan, Kuhn Loeb banker Paul Warburg, Senator Nelson Aldrich, and Assistant Secretary of the Treasury A. Piatt Andrew.

55. The conspirators did not want to call their new private central bank a central bank but instead called it the "Federal Reserve" to fool the people.

56. The Jekyll Island plot was successful and on December 23, 1913, while most of Congress was home for Christmas, the Federal Reserve Act was passed into law, creating a U.S. central bank (the "FED").

57. By the mid 1930's America was so far in debt to the FED it went bankrupt and the Rothschilds secretly foreclosed. President Franklin Roosevelt (FDR) confiscated the private gold of every citizen in America and secretly turned it over to the Rothschilds.

58. To show the Rothschild Illuminati-FED control of America, the Luciferian symbol of an unfinished pyramid was put on the back of the U.S. one dollar bill along with the latin phrase "Novus Ordo Seclorum" which means "New Order of the Ages" or "New World Order." (The Rothschilds also placed an Illuminati pyramid on top of the Israeli Supreme Court Building).

59. On November 21, 1933, FDR admitted to Col. E. Mandell House that: 'The real truth of



the matter is, as you and I know that a financial element in the large centers has owned the Government of the U.S. since the days of Andrew Jackson."

60. In 1932, Congressman Louis McFadden read into the Congressional Record the following statement:

"We have, in this country, one of the most corrupt institutions the world has ever known. I refer to the Federal Reserve Board. This evil institution has impoverished the people of the United States and has practically bankrupted our government. It has done this through the corrupt practices of the moneyed vultures who control it".

61. Further showing their Luciferian roots, the Rothschilds more recently had a Luciferian pyramid built on top of the Israeli Supreme Court Building.

62. The modern Internal Revenue Service was set up in 1913 as the collection agency and enforcer for the Rothschilds and the FED.

63. In 1944 a World Bank (central bank of the world) was established.

64. On December 27, 1945 the International Monetary Fund was created.

65. The World Bank and the International Monetary Fund are controlled by the Rothschilds.

66.. Every government on earth, including the United States, is controlled by the Rothschilds.

67. John F. Kennedy was in process of stripping the FED of its power to issue money when he was assassinated. On November 12, 1963 President John F. Kennedy made the following statement in a speech at Columbia University:

"The high office of the President has been used to foment a plot to destroy the American's freedom and before I leave office, I must inform the citizens of this plight."

68. Ten days after making this statement, Kennedy was murdered.

69. On information and belief, and based on research by numerous credible investigators including former Los Angeles FBI Special Agent in Charge Ted Gunderson, Kennedy was murdered by the CIA to prevent the Rothschilds from losing control of the U.S. money supply.



## **Rockefellers**

70. The Rothschilds established John D. Rockefeller in the United States as their puppet to facilitate their plot to destroy the United States and enslave mankind into a “new world order.”
71. Beginning in 1850 with John D. Rockefeller, the Rockefeller family has built a vast fortune in banking and oil.
72. By 1890 John D. Rockefeller had created an oil monopoly that was allegedly “dissolved by the United States Supreme Court in 1911.
73. The Rothschilds and their puppets the Rockefellers have used their control of the global economy to take over and control every major business corporation on earth.
74. Every government on earth, including the United States, is now operating under a Luciferian (Satanic) shadow world government.

## **Rockefeller Foundations and the Council on Foreign Relations**

75. In 1913, the same year the FED and the IRS was set up, John D. Rockefeller set up the Rockefeller Foundation.
76. The Rockefellers have set up multiple foundations which hide their massive wealth while using it for the systematic accumulation of political power.
77. For about seventy years, the Rockefeller Foundation, Ford Foundation, and Carnegie Endowment for International Peace have worked together to destroy America and bring about a “new world order” worldwide slave plantation.
78. The current patriarch of the Rockefeller family is David Rockefeller.
79. David Rockefeller has openly admitted the Rockefeller family has been engaged in a conspiracy to destroy the sovereignty of the United States and lead it into a “new world order.”
80. In his 2002 Memoirs on page 405 Rockefeller admitted:

"For more than a century ideological extremists at either end of the political spectrum have seized upon well-publicized incidents such as my encounter with Castro to attack the Rockefeller family for the inordinate influence they claim we wield over American political and economic institutions. Some even believe we are part of a secret cabal working against the best interests of the United States, characterizing my family and me as 'internationalists' and of conspiring with others around the world to build a more integrated global political and economic structure – one world, if you will. If that's the charge, I stand guilty, and I am proud of it."

81. In 1991 David Rockefeller made a speech in Baden-Baden, Germany thanking major media for keeping the secret plot for one world government hidden from the masses:

"We are grateful to the Washington Post, The New York Times, Time Magazine and other great publications whose directors have attended our meetings and respected their promises of discretion for almost forty years. It would have been impossible for us to develop our plan for the world if we had been subjected to the lights of publicity during those years. But, the world is now more sophisticated and prepared to march towards a world government. The supranational sovereignty of an intellectual elite and world bankers is surely preferable to the national auto-determination practiced in past centuries."

82. In 1919 the Royal Institute for International Affairs ("RIIA") was set up in London and in 1921 the Council on Foreign Relations ("CFR") was established in New York. These groups are Rothschild-Rockefeller "fronts" for training new world order puppets to be installed in positions of power in government, media, and academia.

83. Nick Rockefeller has admitted that 911 and the "war on terror" is a fraud used by the Rockefellers and their co-conspirators in a scheme to enslave and microchip the population.

84. Nick Rockefeller has admitted that the so-called "womens' movement" is a mass fraud created and financed by the Rockefellers and their co-conspirators for the purpose of destroying the family and turning all child rearing over to the state.

85. The Rockefellers have a long history of financing racial genocide programs, including those of Margaret Sanger. Sanger, the founder of Planned parenthood, called blacks "human weeds" and worked to exterminate them.

### **Rockefeller's Trilateral Commission**

86. In 1973 David Rockefeller founded the Trilateral Commission ("TC") for the purpose of instituting world government ("tri" standing for the proposition of three regions of the world: American, European, and Asian).

87. Former Arizona Senator Barry Goldwater wrote the following about the TC in his 1979 book *With No Apologies*:

"The Trilateral Commission is international and is intended to be the vehicle for multinational consolidation of the commercial and banking interests by seizing control of the political government of the United States. The Trilateral Commission represents a skillful, coordinated effort to seize control and consolidate the four centers of power — political, monetary, intellectual and ecclesiastical."

88. Rockefeller recruited Jimmy Carter and Senator Walter Mondale to the TC and trained them in instituting world government. In 1976 Carter and Mondale were installed as President and Vice-President of the United States and Rockefeller new world order puppets.

89. Mondale had already been a member of Rockefeller's CFR conspiratorial group.

90. In 1973, the same year Mondale joined Rockefeller's Trilateral Commission as a founding member, Mondale introduced P.L. 93-247, a radical bill entitled the "Child Abuse Prevention and Treatment Act" ("CAPTA").

91. There had never been anything like CAPTA in the history of the United States. It completely did away with the United States Constitution and the Bill of Rights.

92. Under CAPTA children are permanently seized from their parents by the state based on unverified hearsay, without a warrant, without due process, without trial by jury, without being allowed to confront witnesses against them, and without being able to obtain legal counsel for their children.

93. CAPTA instituted "closed hearings" thereby using the Illuminati Luciferian doctrine of

absolute secrecy to accomplish its ends.

94. Under CAPTA the alleged victim is taken away and held involuntarily by the state while the alleged "perpetrator" is left to run free.

95. John Walsh of "America's Most Wanted" is a recognized authority on child abuse. He has documented that there is eleven times as much child abuse in foster homes as among the general population.

#### **United Nations of Lucifer**

96. On October 24, 1945 the United Nations was created to institute the Illuminati Luciferian world government. Eighteen acres of prime Manhattan real estate was donated by Rockefeller.

97. The official publishing arm of the U.N. is called Lucius Trust, formerly Lucifer Publishing Company, previously located at 666 United Nations Plaza.

98. On September 11, 1991 President George H.W. Bush, while praising the U.N. invasion of Iraq, spoke of the "illumination (an Illuminati term) of a thousand points of light" and said that what was at stake was a "new world order."

99. George H.W. Bush is a Satan worshipper and member of the powerful Yale Luciferian secret society *Skull and Bones*.

#### **The CIA, Satanism, and Child Trafficking**

100. Ted Gunderson, former Special Agent in Charge of the Los Angeles FBI and a court-confirmed expert on Satanism, has documented that the Central Intelligence Agency ("CIA") operates an international Satanic child trafficking criminal enterprise.

101. Gunderson has exposed a CIA covert child trafficking operation called "The Finders" out of Washington, D.C. The children are being used by Satan worshippers for human sacrifices.

102. Gunderson has documented that there are approximately four million practicing Satan

worshippers across the United States, many of them operating at the highest levels of the United States government.

103. Gunderson has exposed and documented Satanic ritual sexual abuse of hundreds of children at the McMartin Preschool in California.

104. Gunderson and former Nebraska state senator John Decamp have documented and exposed a massive child pedophile ring operating out of Franklin, Nebraska. Children, mostly young boys, were being taken out of Boystown and flown to the Regan-Bush White House for pedophile sex orgies with high ranking federal officials.

105. The June 29, 1989 Washington Times carried the headline *"Homosexual prostitution inquiry ensnares VIPs with Regan, Bush-Call boys took midnight tour of White House."*

106. Former President George H.W. Bush, a Luciferian Devil worshipper, has been identified by some of the child victims as one of the pedophiles at the sex parties. Bush is also a former CIA Director.

107. Gunderson has repeatedly documented that an international Satanic child trafficking conspiracy operates within "child protective services" and the CIA.

108. Gunderson was in Denver, Colorado on November 5, 1997 and documented that at three o'clock in the morning "child protective services" was flying 210 foster children out of the Denver airport en route to New York and then to Paris, France.

#### **Satanic Activity by World Leaders at Bohemian Grove**

109. For over 120 years, world leaders have traveled to Sonoma County, California in the month of July to participate in bizarre Satanic rituals at "Bohemian Grove."

110. Homosexual and pedophile activity is rampant at Bohemian Grove.

111. There have been reports of human sacrifices, including child sacrifices, at Bohemian

Grove.

112. Notable and regular participants in Bohemian Grove activities have included Ronald Regan, George H.W. Bush, and former U.S. Secretary of State Colin Powell.

### **STATE IMPLEMENTATION OF THE INTERNATIONAL LUCIFERIAN CHILD TRAFFICKING CONSPIRACY**

113. The Enterprise, controlling the U.S. federal government through the FED, implements the conspiracy within the 50 states, including North Carolina, through the Regional Federal Reserve Banks, the National Governor's Association, the National Conference of State Legislators, the National League of Cities, and a consortium of co-conspirator private corporations and non-profit groups.

#### **Conspiracy and Extrinsic Fraud Embedded in North Carolina Juvenile Code**

114. North Carolina conspirators joined in the international child trafficking Enterprise have embedded in the North Carolina Juvenile Code [NCGS Chapter 7-B] an extrinsic fraud "bait and switch" scheme designed to steal children.

115. One element of the scheme revolves around fraudulent "neglect" criteria planted in the Juvenile Code at GS § 7B-101(15) ("Definitions-Neglected juvenile") and GS § 7B-1111(a)(1) ("Grounds for terminating parental rights"). The criteria reads:

"The juvenile does not receive proper care, supervision, or discipline from the juvenile's parent, guardian, custodian, or caretaker"... "The juvenile lives in an environment injurious to the juvenile's welfare."

116. 95% of children seized from their parents by the state are seized under the above alleged "neglect" criteria. No such neglect criteria to seize children exists in North Carolina statutory law.

117. NCGS § 7B-503(a) outlines six criteria for nonsecure custody:

(a) An order for nonsecure custody shall be made only when there is a reasonable factual



basis to believe the matters alleged in the petition are true, and

- (1) The juvenile has been abandoned; or
- (2) The juvenile has suffered physical injury or sexual abuse; or
- (3) The juvenile is exposed to a substantial risk of physical injury or sexual abuse because the parent, guardian, custodian, or caretaker has created the conditions likely to cause injury or abuse or has failed to provide, or is unable to provide, adequate supervision or protection; or
- (4) The juvenile is in need of medical treatment to cure, alleviate, or prevent suffering serious physical harm which may result in death, disfigurement, or substantial impairment of bodily functions, and the juvenile's parent, guardian, custodian, or caretaker is unwilling or unable to provide or consent to the medical treatment; or
- (5) The parent, guardian, custodian, or caretaker consents to the nonsecure custody order; or
- (6) The juvenile is a runaway and consents to nonsecure custody.

118. The only "neglect" definitions listed in GS § 7B-101(15) that are also listed as criteria for removal in GS § 7B-503(a)(1-6) are "abandonment"(1) and "medical neglect"(4).

119. GS § 7B-101(15) specifically defines "abandonment" and "medical neglect" as separate and distinct criteria from "lack of proper care" and "injurious environment").

120. When nonsecure custody orders are issued for alleged neglect (lack of "proper care" and "injurious environment"), it is not done under § 7B-503(a)(1)(abandonment) or § 7B-503(a)(3) (medical neglect), but under § 7B-503(a)(3).

#### **The North Carolina "Bait and Switch" Child Stealing Scheme**

121. North Carolina uses its DSS "Juvenile Petition" (AOC-J-130) and its "Order For Nonsecure Custody" (AOC-J-150) to execute a "bait and switch" child stealing scheme.

122. (AOC-J-150) is facially legitimate and correctly contains the six statutory criteria for removing children listed in NCGS § 7B-503(1-6). In contrast, the DSS Petition (AOC-J-130) is a paper fraud that contains the neglect "definitions" found in GS § 7B-101(15).

123. The DSS Petition contains six alleged "neglect criteria" for removing children from the home. Four of the six alleged "criteria" do not statutorily exist in GS § 7B-503(1-6).



124. The DSS Petition is used across the state to seize children on vague and statutorily unauthorized allegations of "neglect" ("neglect" meaning whatever a social worker says is "lack of proper care" or "injurious environment").

125. The conspirators file (AOC-J-130) while a coconspirator judge simultaneously issues (AOC-J-150) and checks the box beside GS § 7B-503(3).

126. The simultaneous filings give the surface appearance children are being removed due to exigent circumstances when in fact they are being seized without any legal authority whatsoever.

127. After the child is seized, the conspirators do away with the § 7B-503(3) "abuse" criteria they used to justify the seizure. The case is quietly switched into a "neglect" case using the definitions in the DSS Petition and § 7B-101(15).

128. 95% of child removals in North Carolina are perpetrated using the neglect "bait and switch" scheme.

129. NCGS § 7B-101(15) and NCGS § 7B-1111(a)(1) are extrinsic fraud "sleeper" statutes that were planted within the Juvenile Code and are used by Defendants to steal children.

130. The "sleeper" statutes cannot be (legally) used to seize children, but "activate" after the seizure in the "dispositional" phase so that the (illegally) seized children can be "adopted out."

#### **N.C. "Interference" Statute Designed to Circumvent the Bill of Rights**

131. NCGS § 7B-303 "Interference with investigation" (2001) allows the DSS to search any house and seize any child, anytime, anyplace, without a warrant.

132. There does not have to be any evidence whatsoever of child maltreatment for the DSS and the juvenile courts to invoke GS § 7B-303.

133. The DSS routinely files fraudulent petitions alleging GS § 7B-303 "interference" so as to bring innocent families under juvenile court "jurisdiction."

134. Sworn testimony in the N.C. *Stumbo* case shows it is DSS policy and procedure to use an anonymous phone or some other trivial excuse to force an investigation into an entire family.
135. Parents violate GS § 7B-303 by "*refusing to allow the director to observe or interview the juvenile in private*" (seizure of the child without a warrant). .
136. Parents violate GS § 7B-303 by "*refusing to allow the director to arrange for an evaluation of the juvenile by a physician or other expert*" (seizure of the child without a warrant).
137. An "evaluation" is by nature a preliminary investigative tool, indicating there has not yet been a determination of any maltreatment of the child.
138. The statute gives the Director unlimited power to demand an "evaluation of the juvenile" without regard to guilt or innocence. In practice, the parent and child have no power to refuse.
139. The last definition of a violation in GS § 7B-303 is "*or other conduct that makes it impossible for the director to carry out the duty to investigate*" (giving the DSS Director arbitrary and unfettered discretion to determine whether the statute has been violated).
140. GS § 7B-303(f) subjects parents to criminal penalties for not obeying the DSS: "*An order entered pursuant to this section is enforceable by civil or criminal contempt as provided in Chapter 5A of the General Statutes.*"
141. In practice, GS § 7B-303 gives parents two choices: (a) give up their fundamental rights and those of their children; or (b) go to jail.
142. In 2005 the state changed the title of GS § 7B-303 from "interference with investigation" to "interference with assessment."
143. The minor cosmetic word change in the title of GS § 7B-303 did not affect its practical implementation. The statute maintains its original elements and criminal sanctions, and continues

to be implemented statewide by N.C. social workers to circumvent the Bill of Rights.

### **The Secret Files of the Conspirators**

144. The North Carolina child trafficking criminal enterprise seizes, holds, and "adopts out" children

using SECRET FILES that only the child trafficking conspirators are allowed to see.

145. All 100 DSS agencies in the state maintain and use the secret files to seize, hold, and "adopt out" children. .

146. The North Carolina Administrative Code ("NCAC") documents the secret files as official state policy at 10A NCAC 70A .0112.

147. Administrative rule NCAC 70A .0113 prohibits parents from access to the secret files being used to kidnap their children. Everyone else involved in the alleged "case" (kidnapping) is allowed unfettered access to the files.

148. The secret files are extensive and cover every aspect of the state's DSS "case" against the family.

149. The North Carolina DHHS Manual warns social workers not to reveal the contents of the secret files to parents because then the parents would be able to appeal:

"When families receive other social services, they have appeal rights among which is the right to examine the case record. If the parent were allowed to examine the CPS record, confidential information such as the child's statements or the identity of the reporter could be obtained." (NCDHHS Manual Chapter VIII-1424).

150. Among the secret file "evidence" that the DHHS does not want parents to be able to appeal are "the child's statements."

151. The secret files of the child traffickers make it impossible for North Carolina parents and children to defend themselves.

### **North Carolina Seizes Children Statewide With No Pre-Deprivation Due Process**

152. In 2003, Mecklenburg County Department of Social Services ("DSS") Attorney Tyrone Wade was deposed in the N.C. case of *Yinka Fasinro vs Mecklenburg County*.

153. Wade admitted in the deposition that pre-deprivation juvenile court hearings do not exist in Mecklenburg County or anywhere in the State of North Carolina.

154. 100% of children seized by the state of North Carolina are seized with *ex parte* nonsecure orders and receive no due process notice or opportunity to respond prior to the seizure.

### **HOW MECKLENBURG COUNTY STEALS CHILDREN**

155. Beginning in the mid-1980's and continuing to the present, the Enterprise implemented a child trafficking and child kidnapping scheme using the closed and secretive Mecklenburg County "Juvenile Courts" and "CPS" system as a front. Hiding behind the juvenile court "cloak of confidentiality" the operation seizes, holds, and "adopts out" children without any pre-deprivation or post-deprivation due process of law.

### **Mecklenburg County Child Trafficking Scheme Eliminates AOC Juvenile Forms**

156. The North Carolina Administrative Office of the Courts ("AOC") issues official forms to be used by every DSS and juvenile court in the state. Each AOC form has numbers and letters identifying the form.

157. Beginning no later than the early 1990's the enterprise replaced the official state AOC juvenile forms with paper frauds, including a fake "non-secure custody order" and a fake "summons."

158. The enterprise has used the fraudulent juvenile forms to fraudulently and illegally seize thousands of children over the past two decades.

**“Conscience Shocking” Extrinsic Fraud Scheme Eliminates Post Deprivation Due Process Hearings Mandated by NCGS § 7B-506**

159. It is well established in federal and state law that, although exigent circumstances may allow children in some cases to be removed from their parents without a pre-deprivation hearing, in all cases there must be a prompt post-deprivation hearing.

160. NCGS § 7B-506 "Hearing to determine need for continued nonsecure custody" mandates that:

"(a) **No juvenile shall be held** under a nonsecure custody order for more than seven calendar days without a hearing on the merits or a hearing to determine the need for continued custody...

(b) At a hearing to determine the need for continued custody, the court shall receive testimony and shall allow the guardian ad litem, or juvenile, and the juvenile's parent, guardian, custodian, or caretaker an opportunity to introduce evidence, to be heard in the person's own behalf, and to examine witnesses. The State shall bear the burden at every stage of the proceedings to provide clear and convincing evidence that the juvenile's placement in custody is necessary."

161. The post-deprivation hearings mandated by GS § 7B-506 do not exist in Mecklenburg County. They have been eliminated through the extrinsic fraud scheme set forth below.

**Fraudulent “Juvenile Summons”**

162. The first step in the Mecklenburg County child trafficking scheme to eliminate § 7B-506 hearings is to eliminate notice of the hearings.

163. The North Carolina Juvenile Code at NCGS § 7B-406 "Issuance of summons" mandates the following:

(a) "Immediately after a petition has been filed alleging that a juvenile is abused neglected, or dependent, the clerk shall issue a summons to the parent, guardian, custodian, or caretaker requiring them to appear for a hearing at the time and place stated in the summons. A copy of the petition shall be attached to each summons. **A summons shall be on a printed form supplied by the Administrative Office of the Courts and shall include:**

- (1) Notice of the nature of the proceeding;
- (2) Notice of any right to counsel and information about how to seek the appointment of counsel prior to a hearing;
- (3) Notice that, if the court determines at the hearing that the allegations of the petition are true, the

court will conduct a dispositional hearing to consider the needs of the juvenile and enter an order designed to meet those needs and the objectives of the State; and

(4) Notice that the dispositional order or a subsequent order:

- a. May remove the juvenile from the custody of the parent, guardian, or custodian.
- b. May require that the juvenile receive medical, psychiatric, psychological, or other treatment and that the parent participate in the treatment.
- c. May require the parent to undergo psychiatric, psychological, or other treatment or counseling for the purpose of remedying the behaviors or conditions that are alleged in the petition or that contributed to the removal of the juvenile from the custody of that person.
- d. May order the parent to pay for treatment that is ordered for the juvenile or the parent."

164. The "printed form supplied by the Administrative Office of the Courts" mandated by NCGS § 7B-406 is state form AOC-J-142 entitled "Juvenile Summons and Notice of Hearing."

165. The enterprise replaced AOC-J-142 with a fake entitled "Juvenile Summons." The fake eliminates the words "and Notice of Hearing" from the title and then falsely states that the hearing is for the following purpose:

**"YOU ARE HEREBY SUMMONED TO APPEAR** in Juvenile Court in the Criminal Courts Building, 700 East Fourth, Charlotte, North Carolina at \_\_\_\_\_ o'clock \_\_\_\_ M., on the \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ the first day of Juvenile Court following service, for a hearing to consider the appointment of counsel for the parents(s) (in abuse, neglect, or dependency proceedings) and the child and to set a date for hearing on the petition served with this summons." (Emphasis in original).

166. As shown above, the fraudulent "Juvenile Summons" removes all notice of the statutorily mandated § 7B-506 post-deprivation due process hearing and instead falsely tells parents that the upcoming hearing is only "to appoint counsel" and to "set a date for (a) hearing."

167. After eliminating all notice of the § 7B-506 hearing, the conspirators move to the next step: the total elimination of the hearings themselves.

#### **Extrinsic Fraud Eliminates § 7B-506 Hearings**



168. Mecklenburg County holds no § 7B-506 due process hearings as mandated by law. Instead there is a quick "hearing to appoint counsel" and "set a date for (a) hearing."

169. Because the fraudulent "Juvenile Summons" eliminates § 7B-406 notice and because only conspirators are allowed into the "hearings" parents are totally unaware that: (a) they are being just deprived of statutorily mandated § 7B-506 due process; and (b) their children are being illegally held in violation of § 7B-506.

**Fake "Court Orders" Claim Parents "Consented" to State Seizure of Their Children**

170. After denying parents a GS § 7B-506 seven day hearing, the conspirators plant into the "file" one of their paper frauds entitled "Initial (7-Day) Order" that falsely claims:

"An INITIAL (7-DAY) HEARING was held pursuant to N.C.G.S. § 7B-506 on \_\_\_\_\_, \_\_\_\_\_. The Court finds by CLEAR and CONVINCING EVIDENCE that:..."

171. The "Initial (7-Day) Order" falsely checks off a box stating the child continues to be held because: *"The parent consented to the non-secure custody."*

172. Parents are not allowed to see the "Initial (7-Day) Order" and so never discover the fraud.

173. The "Initial (Seven-Day) Order" alleges to contain additional findings of fact, conclusions of law, and judicial orders based on a hearing that never took place.

174. NCGS § 7B-506(e) mandates that after the initial seven day hearing "...a subsequent hearing on continued custody shall be held within seven business days of that hearing...and pending a hearing on the merits, hearings thereafter shall be held at intervals of no more than 30 calendar days."

175. To fraudulently eliminate the § 7B-506(e) hearings, the conspirators insert in their "Initial (7-Day) Order" (on a back page in an obscure location) that: *"The right to a hearing within seven days to determine the need for continued nonsecure custody will be waived unless it is appropriately asserted."*



176. The statutorily mandated burden on the state to have § 7B-506(e) hearings is shifted to the parents, who must "appropriately assert" their right to the hearings or lose them.

177. It is impossible for parents to "appropriately assert" their right to § 7B-506(e) hearings because they are not aware of the existence of the "Initial (7-Day) Order" or its secret "requirement."

### **Extrinsic Fraud Denies Right to Counsel**

178. Instead of notifying parents of their right to counsel as mandated by GS § 7B-406(b)(2), Mecklenburg County secretly "court appoints" attorneys for parents before any hearings take place and without the parents' knowledge or consent.

179. The "court appointed" attorneys come from a pool of hand-picked conspirators joined in the Mecklenburg County child trafficking criminal enterprise.

180. The court appointed attorneys are joined in perpetrating the GS § 7B-506 "seven day hearing" fraud. They prevent parents from discovering and exercising their due process rights and thereby getting their children back at the seven day hearing. .

181. Conspirator guardian ad litem ("GAL") attorneys are "court appointed" to the children without parental knowledge or consent and before the parents are found "guilty" of anything.

182. The fraud makes the children "clients" of the GAL conspirator attorneys. "Attorney-client privilege" is then invoked by the child traffickers to completely cut the children off from their parents, the family attorney, and everyone else outside the criminal enterprise.

183. The North Carolina GAL manual contains form letters notifying parents that children are not allowed to talk to their parent's attorney *"even if the child wants to."*

184. A second form letter from the N.C. GAL manual to the family attorney states: "Further, the Guardian ad Litem and I specifically prohibit...you, or any agents or anyone on behalf of any

attorney involved in this case...from having any contact whatsoever with my client or discussing this case with him/her in any manner."

185. The conspirator GAL attorneys thereby isolate and hold the children hostage. No one besides the child traffickers ever again have access to the children.

### **Extrinsic Fraud Eliminates Adjudication Hearings**

186. NCGS § 7B-802 (2001) states that: "The adjudicatory hearing shall be a judicial process designed to adjudicate the existence or nonexistence of any of the conditions alleged in a petition. In the adjudicatory hearing, the court shall protect the rights of the juvenile and the juvenile's parent to assure due process of law."

187. The conspirators eliminate adjudication hearings through a scheme called a "Dependency Mediation Agreement."

188. The "Dependency Mediation Agreement" is used against all families, including those whose children are not dependent.

189. The conspirators terrorize parents by telling them they must sign the "Dependency Mediation Agreement" if they want to get their children back. .

190. After it is signed by the parents, the "Dependency Mediation Agreement" is subsequently presented as a "plea bargain" admission of guilt.

191. The "plea bargain" eliminates the right to an adjudicatory (evidentiary) hearing and thereby covers up the previous illegal acts used by the conspirators to seize and hold children.

### **The "Conscience Shocking" Bottom Line of the Extrinsic Fraud Scheme**

192. Using the above criminal scheme enables the child traffickers to:

- (a) Eliminate all pre-deprivation hearings with their ex parte orders.
- (b) Eliminate all post-deprivation hearings with their fraudulent "Juvenile Summons" and "Initial (7-Day) Order."
- (c) Eliminate all adjudicatory hearings with their fraudulent "Dependency Mediation

Agreement.”

193. The net effect of the child trafficking scheme is that children are seized and held in “state” custody indefinitely with NO DUE PROCESS WHATSOEVER AND WITH THE KIDNAPPERS NEVER HAVING TO PRODUCE ANY WITNESSES OR EVIDENCE.

#### **Mecklenburg County's Paper Fraud "Nonsecure Custody Order"**

194. An official state juvenile non-secure custody form is issued by the North Carolina Administrative Office of the Courts ("AOC") and is to be used statewide in all 100 counties. The form is AOC-J-150 entitled "Order For Nonsecure Custody."

195. The child traffickers replaced AOC-J-150 with one of their paper frauds entitled "Nonsecure Custody Order."

196. Mecklenburg County's "Nonsecure Custody Order" appears on its face to list the six criteria for nonsecure custody in GS § 7B-503(a)(1-6). However, a closer reading shows that the wording and the criteria of GS § 7B-503(a)(3) has been fraudulently changed. The changes (in bold) read:

"The juvenile is exposed to a substantial risk of physical injury or sexual abuse because the parent, guardian, or custodian **has inflicted the injury or abuse;** created the conditions **causing the injury, abuse, or exposure;** failed to provide, or is unable to provide, adequate supervision or protection; or"

197. The order has a check box beside each of the six criteria listed.

198. The fake nonsecure order fabricates “abuse criteria” that is not in the statute by adding "has inflicted the injury or abuse" and changing "likely to cause" to "causing."

199. The fake inserts two semicolons into the statute. The actual statute has no semicolons in its body.

200. The insertion of the semicolons changes the statute from one continuous sentence dealing exclusively with risk of physical injury or sexual abuse into three separate stand alone clauses.

201. The last clause, "failed to provide, or is unable to provide, adequate supervision or protection" becomes a stand alone "neglect" clause.
202. The changed "statute" adds a further false neglect indication by changing "injury or abuse" to "injury, abuse, or exposure."
203. The stand alone phrase "failed to provide, or is unable to provide, adequate supervision or protection" creates criteria so vague it allows Mecklenburg County to target and seize any child for "neglect" any time, for any reason, or for no reason.
204. Mecklenburg County uses the fraud to seize children on a vast array of fabricated and fraudulent "neglect" criteria such as poverty, home schooling, male "control" of the family (also called "domestic violence"), failure to "cooperate" with DSS, etc.
205. The inclusion of fabricated "abuse" and "neglect" criteria into the same "removal statute" also allows Mecklenburg County to seize children on vague allegations of neglect, manufacture fraudulent post-seizure "evidence" of abuse, and retroactively claim that abuse was the original allegation.
206. 95% of children seized from their parents by the Mecklenburg County DSS are seized with a fake "statute" that does not exist.

#### **Highest Levels of North Carolina Government Joined in the Enterprise**

207. The fake, fraudulent Mecklenburg County "Juvenile Court documents" are regularly sent up on appeal and reviewed by the North Carolina Court of Appeals and the North Carolina Supreme Court.
208. The North Carolina Administrative Office of the Courts ("AOC") is the entity that issues the official AOC court documents. The AOC also oversees and regularly reviews the Mecklenburg County Juvenile Court and its fake, fraudulent documents.

## **GENOCIDE AGAINST PATRIARCHAL CHRISTIANS AND ESTABLISHMENT OF THE NEW STATE RELIGION OF FEMINISM**

209. The North Carolina child trafficking scheme relies on a pervasive extrinsic fraud scheme that operates under the generic term "domestic violence."

210. Alleged "domestic violence" is one of the fraudulent "neglect criteria" used to steal children in the North Carolina "bait and switch" child stealing scheme.

211. The term "domestic violence" is a code phrase for a radical lesbian / feminist agenda being used as a tool in western society to destroy the traditional family.

212. The stated goal of radical feminism is to destroy "the patriarchy" (feminist term for male "control") by taking children away from parents and raising them in state custody.

213. The United States Department of Health and Human Services ("USDHHS") enforces the feminist agenda, as shown by the following statement of Dr. Mary Jo Bane, former Assistant Secretary for Children and Families, United States Department of Health and Human Services:

**"In order to raise children with equality, we must take them away from families and communally raise them."**

214. The above official policy of the USDHHS was greatly accelerated from 1992-2001 under the direction of rabid lesbian / feminist ideologues Hillary Clinton (wife of the President), Donna Shalala (Secretary of USDHHS), Janet Reno (U.S. Attorney General).

215. On April 19, 1993 Reno, Clinton, and the United States government burned alive 74 men, women, and children because they practiced patriarchal religious beliefs.

Article II of the International Convention on the Prevention and Punishment of genocide states:

In the present Convention, genocide means any of the following acts committed with intent to destroy, in whole or in part, a national, ethnical, racial, or religious group, as such:

- (a) *Killing members of the group;*
- (b) *Causing serious bodily or mental harm to members of the group;*
- (c) *Deliberately inflicting on the group conditions of life calculated to bring about its*

*physical destruction in whole or in part;*  
*(d) imposing measures intended to prevent births within the group; (e) forcibly*  
*transferring children of the group to another group.*

216. North Carolina enforces the USDHHS radical feminist agenda by using "domestic violence" allegations within its CPS system to seize children from families that practice Christian "patriarchal" religious beliefs.

217. There is no statutory authority in North Carolina for seizing children for "domestic violence."

218. Furthermore, using "domestic violence" allegations to seize children is specifically prohibited by the North Carolina DHHS Manual's "Screen Out Tool" which states that domestic violence is "not a CPS issue."

219. The USDHHS and North Carolina's CPS and "domestic violence" programs use the radical lesbian / feminist definition of "domestic violence":

"Battering is an intentional act used to gain **power and control** over another person." (From the official Charlotte-Mecklenburg website)

"Domestic violence is really all about **power and control**, I think even more than hitting." (Karen Thompson of Mecklenburg County's United Family Services).

"We believe that **patriarchy and gender inequality play a central role** at both the personal and societal level **in creating and maintaining domestic violence....** We believe it is vital to understand and eliminate all forms of oppression including sexism, racism and homophobia." (N.C. Coalition Against Domestic Violence)

220. There is no N.C. statute that authorizes the seizure of children for "patriarchy" and "gender inequality" or because rabid N.C. feminists have an obsession with male "control."

221. Seized Christian children and their parents are forced into state "re-education" brainwashing programs to destroy the children's belief system and replace it with the official state belief system of feminism.

222. Mecklenburg County's feminist state re-education programs are the "Mecklenburg

County Women's Commission" and "NOVA."

223. Women's Commission and NOVA are official government agencies / programs that receive millions of dollars in county and DSS funding and have offices at the DSS and in the Mecklenburg County Courthouse.

224. Women's Commission and NOVA work in formal partnership with a Mecklenburg County non-profit agency called United Family Services. The agencies have shared space for staff and services, shared strategic planning, and shared staff training.

225. Marie White of the Women's Commission and Karen Parker Thompson of United Family Services are also on the Board of Directors of a radical feminist group called the North Carolina Coalition Against Domestic Violence ("NCCADV").

226. The NCCADV is linked to the Mecklenburg County website.

227. The NCCADV website states "The mission of NCCADV *is to create social change* through the elimination of the institutional, cultural, and individual oppressions that contribute to domestic violence."

228. The NCCADV is the state arm of the National Coalition Against Domestic Violence ("NCADV"). NCADV goals include: "organize for collective power..." and "work for major societal changes." The group says domestic violence results from "societal abuse of power."

229. The NCCADV has a "Lesbian / Bisexual Women's Caucus" and links to a radical feminist site entitled "North Carolina Women United" ("NCWU").

230. The NCWU site urges visitors to subscribe to its email list to "connect to the feminist movement in North Carolina."

231. The NCWU site states that "Batterer intervention programs" are designed to "help him / her *adopt a different world view...*"



232. NCWU membership includes radical feminist and homosexual groups such as the National Abortion Rights Action League, the N.C Chapter of the National Organization for Women ("NOW"), Planned Parenthood of Central North Carolina, and Equality NC.

233. Equality NC is a self-proclaimed "statewide advocacy organization that works to secure equal rights and justice for lesbian, gay, bisexual and transgender North Carolinians."

234. NCWU links to the radical feminist NOW website which in turn links to hard core feminist sites such as "Hothead Paisan Homosexual Lesbian Terrorist"; "Club for Radical Feminists"; and "Young Radical Wimmin" (whose hatred of men is so profound they eliminated "men" from the word "women."

235. NCCADV states that it "...coordinates public policy related to battered women...Staff and volunteers also sit on a variety of state committees...These include: Victim's Services Committee of the Governor's Crime Commission, the N. C. Public Health Alliance on Domestic Violence, N. C. Women United, the Covenant for North Carolina's Children, and the Governor's Commission on Domestic Violence."

236. NCCADV states that it "...works closely with the Council for Women, Department of Social Services, Legal Services of N. C...and the North Carolina Medical Society..."

237. The Charlotte-Mecklenburg website lists as "characteristics of batterers": "He is jealous, He blames others for his faults, He blames circumstances for his problems, He demonstrates unpredictable behavior, He always asks for another chance, He says he'll change, He plays on his partner's guilt/love, He is tenacious, He is closed minded, His way is the only way, He will seem charming to outsiders."

238. The above definitions of "domestic violence" include centuries-old elements of the common human experience. (Even "charm" becomes "domestic violence"). The definition makes

all men "guilty" and allows CPS to arbitrarily seize any child.

239. The conspirators attack and destroy families using a malicious scheme entitled NOVA.

240. The Charlotte-Mecklenburg website states "Nova is a year long psycho-educational program...based on the widely acknowledged Duluth and ADA Curriculums.

241. Mecklenburg County's Marie White has stated: "The NOVA program, first of all to get into the NOVA program almost all of the participants are court ordered or sent through Youth and Family Services...The groups run, the perpetrators are in for a year."

242. The time required to complete the NOVA program coincides exactly with that statutorily mandated by federal law before the state can "terminate parental rights" and "adopt out" children.

243. Simply ordering a father into the NOVA program constitutes an automatic "death sentence" for his family.

244. The "Duluth Curriculum" used by Mecklenburg County's NOVA program is based on an assessment tool called "The Power and Control Wheel." Under the wheel's section entitled "Using Male Privilege" are the following "domestic violence" definitions:

- (a) Treating her like a servant
- (b) Making all the big decisions
- (c) Acting like the "King of the Castle"
- (d) Being the one to decide men's and women's roles

245. The Charlotte-Mecklenburg website lists "future predictors" of "domestic violence" as:

"Does he have strong *traditional ideas* about what a man should be and what a woman should be? Does he think a woman should stay at home, take care of her husband, and follow his wishes and orders? In other words, does he act like women are second class citizens?"

246. The Charlotte-Mecklenburg website declares that one of the "characteristics of batterers" is "*He believes in rigid gender roles.*"

The Charlotte-Mecklenburg website states that domestic violence consists of "power and control, using male privilege, treating her like a servant, making all the "big" decisions, *quoting misinterpreted Bible passages*, and acting like the "King of the castle."

247. Mecklenburg County has published a widely distributed full color brochure stating that *traditional Christian marriage is a "weapon used in domestic violence."*

248. Mecklenburg County's Marie White has stated that for a man to complete the NOVA program he must admit his (patriarchal) belief systems are "abusive" and give them up:

"In order to get in the group, first of all, the perpetrators have to take some accountability for their actions, *they have to admit to being abusive*. Each group is made up of a male and a female facilitator and they, *its very difficult because they address their belief systems, And they hold them accountable for their actions and their belief system.*"

*"It is part of their belief system.* That's why most batterer's groups is, unless they are there court ordered or they're there with another authority to keep them there, *they leave because once you start challenging that belief system, who wants to sit through a year of that?*

249. It is impossible for patriarchal Christians to complete the NOVA program without renouncing their Christian beliefs and embracing the feminist belief system.

250. Christian mothers who voluntarily submit to their husbands as part of their Biblical religious beliefs are forced by the state to give up their beliefs and embrace feminism.

251. The county's radical feminists force Christian mothers to renounce their religious beliefs (under threat of losing their children forever) even if the county is fully aware there was no domestic violence. Dixie Lowery, a social worker who does "domestic violence assessments" for the Mecklenburg County, testified under oath in 2003 that:

Many times women will come into us saying that they are not a victim because they do not understand what the dynamics are with domestic violence. *Many of them come in and they've never been physically assaulted. So they believe they're not a victim.* But they have all the other elements or many of the elements within the power and control wheel that *we would identify them as a victim.*

252. Patriarchal Christian beliefs are proscribed, and the radical feminist agenda is mandated, statewide. The N.C. administrative code (01 NCAC 17 .0707) mandates that: "*All* abuser treatment programs...shall include...identification of the *personal, societal, and cultural values and beliefs* that legitimize and sustain violence and oppression."

253. Mecklenburg County and the State of North Carolina have established radical feminism as the *de facto* official state religion (belief system).

254. The religion of feminism is enforced by state agents armed with guns.

255. Fathers who resist the state religion of feminism are jailed, beaten, or killed by law enforcement. Children of patriarchal Christians are seized by radical DSS feminists, judges, and GALs. The children are held hostage by the state indefinitely until the parents comply and renounce their God and their religion.

256. If parents refuse to renounce their religious beliefs and embrace the feminist religion, the state "terminates parental rights" and "adopts out" the children.

#### **CHILD TRAFFICKERS TARGET JACK AND KATHY STRATTON'S TEN CHRISTIAN BI-RACIAL CHILDREN**

257. On December 18, 2000, Mecklenburg County child traffickers (as the result of an anonymous phone call) became aware that Plaintiff Jack Stratton and his wife Kathy had ten bi-racial children.

258. On December 19, 2000 the Enterprise sent its agents Defendant DSS social workers Katherine Dorminey and Gretechen Caldwell to the Stratton residence at 2423 Eastway Drive in Charlotte, N.C.

259. Dorminey and Caldwell viewed the ten Stratton children and left. They did not say they were going to return or that the Strattons were under any kind of investigation. No court paperwork had ever been filed and there was no "court case" anywhere against the Stratton

parents or any of their ten children.

260. On December 19, 2000, the same day, Jack and Kathy Stratton and their ten children all permanently moved from 2423 Eastway Drive. It was later revealed through DSS records that the Strattons' ten children were targeted for seizure the next day, December 20, 2000, by the Mecklenburg County DSS.

261. On December 25, 2000, the family permanently moved from Mecklenburg County into a nice home in Gaston County.

262. On December 20, 2000, Defendants Dorminey and Caldwell re-appeared at 2415 Eastway Drive, the home of Joan Stratton, Jack Stratton's mother.

263. Joan Stratton told the social workers that Jack and Kathy had permanently moved from 2423 Eastway Drive and would not be returning. Dorminey became enraged.

264. The Stratton family had moved before the Enterprise could file any Mecklenburg County court documents to obtain "jurisdiction" over the family so as to seize the children..

265. The Strattons were living outside of Mecklenburg County, outside the jurisdiction of the Mecklenburg County DSS and the Mecklenburg County Courts.

#### **Child Traffickers Perpetrate Extrinsic Fraud Scheme to "Create" Jurisdiction**

266. After learning their intended victims had moved, Defendants Mecklenburg County DSS Attorney Tyrone Wade and Mecklenburg County District Court Judge David Cayer conspired and concocted an extrinsic fraud scheme to make it appear Mecklenburg County had obtained "jurisdiction" over Jack and Kathy Stratton and their ten children.

267. On December 20, 2000, the DSS filed a (fake) NCGS § 7B-303 "interference petition" naming grandmother Joan Stratton as the sole respondent, **but fraudulently and inconspicuously attaching ten case file numbers to the interference petition.**

268. The next day, December 21, 2000 Joan Stratton was illegally hauled into an “interference hearing” (in violation of § 7B-303, which only authorizes the hearing only after five days notice to respondent).

269. Cayer generated and signed a fraudulent “order” from the Joan Stratton “interference” hearing, **only Cayer removed Joan Stratton’s name as the respondent and replaced it with the names of the ten Stratton children, along with the fraudulent ten case file numbers.**

270. Cayer’s alleged ‘order” completely deleted Joan Stratton as the respondent and fraudulently named her as only a “witness” at the hearing.

271. The N.C. AOC has an official form to be used across the state for court orders pursuant to NCGS § 7B-303 “interference” hearings. The form is AOC-J-123 entitled “Order to Cease Obstruction Of Or Interference With Juvenile Investigation.”

272. Cayer did not use AOC-J-123, but instead gave it the fake title “Juvenile Order.”

273. Cayer’s fraudulent “Juvenile Order” falsely proclaimed that Mecklenburg County had obtained “jurisdiction” over Jack and Kathy Stratton and their ten children.

274. It is legally impossible that Cayer and the Mecklenburg County DSS obtained jurisdiction through the Joan Stratton “interference” petition and hearing because:

- (a) Neither Jack and Kathy Stratton or any of their ten children were ever named as parties in the Joan Stratton interference case
- (b) No summonses were ever issued for Jack and Kathy Stratton or any of their ten children in the Joan Stratton interference case.
- (c) Neither Jack and Kathy Stratton or any of their children were present at Joan Stratton’s interference hearing.

275. Cayer’s “Juvenile Order” purported to issue dozens of “findings of fact” and “conclusions of law” finding Jack and Kathy Stratton guilty of “neglect” and “authorizing” the hunting down and seizing of their ten children.

276. NCGS § 7B-303 does not authorize Cayer or any other judge to hold an ex parte abuse,

neglect, and dependency adjudication, to issue “findings” of “neglect”, or to authorize the seizure of children.

277. NCGS § 7B-303 strictly limits the authority of judges to findings that the respondent has or has not interfered with an investigation, and orders that the respondent cease the interference.

278. The statutes mandate that any “order” from the Joan Stratton “interference” petition (a) be on AOC-J-123; (b) name Joan Stratton as the sole respondent; and (c) have one case file number to correspond with the one respondent; (d) limit its findings to whether or not Joan Stratton had “interfered” with a DSS investigation.

279. On December 22, 2000, Cayer and Wade isolated Joan Stratton in a closed “hearing room” without an attorney and repeatedly threatened to put her in jail. She was terrified and had a massive heart attack three days later.

### **The Kidnapping of Jack and Kathy Stratton’s Ten Children**

280. On January 30, 2001, Mecklenburg child traffickers crossed over into Gaston County, outside their jurisdiction, and kidnapped Jack and Kathy Stratton’s ten children while Jack was at work.

281. Physically perpetrating the kidnapping were Defendants Donna Fayko, Lisa Looby, Gretchen Caldwell, and numerous other individuals.

282. The conspirators generated numerous fake and fraudulent documents in an attempt to cover the kidnapping.

283. Defendant Mecklenburg DSS child traffickers Gretchen Caldwell, Tyrone Wade, Donna Fayko, and Lisa Looby generated a perjured “petition” falsely claiming that on January 30, 2001 the entire Stratton family was living at 2423 Eastway Drive in Charlotte.

284. On February 22, 2002, Gretchen Caldwell was finally put under oath to testify for the



first time, over a year after Caldwell filed her perjured January 30, 2001 petition claiming the Stratton family was living in Charlotte. Caldwell admitted under oath that on January 30, 2001, the Stratton family had been in fact living in Gaston County.

285. Defendant Yvonne Mims Evans (Mecklenburg County District Court Judge) generated and signed a fake and fraudulent “Nonsecure Custody Order” alleging to authorize the seizure.

286. It is impossible that Evans or the DSS had jurisdiction over any member of the Stratton family because:

(a) Pursuant to Chapter 7A of the North Carolina General Statutes, Evans has no jurisdiction in Gaston County, a fact she publicly admitted in a written submission she made in 2001 to the National Council of Juvenile and Family Court Judges Evans cannot authorize the seizure of children from Gaston County.

(b) Evans attached the ten fraudulent case file numbers from the Joan Stratton “interference hearing” to her fake “nonsecure custody order.”

(c) The Stratton parents and children were not parties in the Joan Stratton case and Joan Stratton’s case file numbers do not apply to Jack and Kathy Stratton or any of their ten children. The N.C. Supreme Court has stated there has never been any case in any federal, state, or local court in which a person who was not a party in an action can be bound by the judgment

(d) NCGS § 7B-303 mandates that any judicial order issued pursuant to an “interference” hearing is only valid for 10 days. After that the order expires and any action based on it is null and void. Therefore, even if the alleged December 22, 2000 “order” signed by Cayer had been valid, the order along with the ten case numbers expired on January 1, 2010 and could not be used for any purpose on January 30, 2001.

(e) The Joan Stratton “interference” hearing and all its alleged orders are legally null and void in their entirety because the hearing violated the NCGS § 7B-303 mandate that a hearing must be held at least five days after service of the petition.

(f) The January 30, 2001 documents allegedly used to seize the children were fakes and the “statute” on the fake “nonsecure custody order” does not even statutorily exist.

(g) No summonses were ever issued for Jack and Kathy Stratton within five days of the December 22, 2000 hearing as mandated by Rule 4 of the NCRCP. Thus *arguendo*, even if there had been some way to link Jack and Kathy Stratton to the December 22, 2000 Joan Stratton “interference” hearing, the action would have been discontinued five days after the hearing when no summonses were issued to the parents.

**North Carolina Department of Health and Human Services Manual Proves Mecklenburg County Had No Authority in Gaston County**

287. The North Carolina Department of Health and Human Services (“NCDHHS”) Manual Chapter V “Cross County Issues”, page 4, sets forth the exact situation that occurred pursuant to Plaintiffs’ December 25, 2000 move from Mecklenburg to Gaston County:

“One County Initiates an Investigative Assessment and During the Course of the Assessment the Family Moves to Another County”...Issue: Families may move across county lines during the completion of the investigative assessment....For purposes of this section only, the family’s original county of residence is defined as the Home County and the family’s new county of residence is defined as the Reciprocal County. The family’s new county of residence becomes the home county once the new residence is verified and the new county of residence takes overall case management responsibility.

Responsibilities of the Reciprocal County (New County of Residence)

- The **reciprocal county** shall make face to face contact with the child and parents within 48 hours...
- The **reciprocal county** takes overall case management responsibility, completing the remainder of the investigative assessment including completion of all structured making assessment instruments.
- If the need for a petition or Non-Secure Custody order arises, **the reciprocal county** takes on these responsibilities as the new county of residence.

288. The above state mandates prohibit the Mecklenburg County DSS from seizing the Stratton children from Gaston County.

**Gaston County Sheriff’s Deputy Jeanette Seagle**

289. Because on 1/30/01 they were outside their jurisdiction in Gaston County, the Mecklenburg County kidnappers could not bring Charlotte-Mecklenburg police or sheriff’s deputies to seize the Strattons’ children. Instead they contacted the Gaston County Sheriff to send deputies to accompany them on the seizure.

290. Gaston County Deputy Jeanette Seagle was called and was on the scene on 1/30/01 when Jack and Kathy Stratton’s ten children were seized. At the time Seagle was a 29 year veteran, a detective, and a guardian ad litem.

291. After arriving at the Stratton home and seeing the Stratton's ten children, Seagle attempted to stop the children from being taken but the Mecklenburg child traffickers took the children over Seagle's objections. Seagle later submitted a sworn affidavit exposing the DSS kidnapping.

#### **Trauma and Assault on the Children at Carolinas Healthcare**

292. After being kidnapped and taken across county lines into Mecklenburg County, the Strattons' ten children, including (then 11 year old) Plaintiff Solomon Stratton, were illegally taken to Carolinas Medical Center and forced to undergo traumatic assaults on their bodies, including intensive anal and vaginal exams.

293. The Strattons' children especially the younger ones, were severely traumatized by the kidnapping and subsequent bodily trauma upon them.

294. There was never any court order of any kind authorizing the assaults.

295. There was no parental consent for the assaults and no consent was ever sought by anyone.

296. No one ever notified the parents that the assaults were taking place and the parents were not allowed to be present or even know where their children were.

297. The assaults were perpetrated in spite of the fact that there have never been any allegations of any kind of abuse and DSS records show the original anonymous phone caller informed the DSS there was no abuse.

298. CHS medical records showed there was no abuse or neglect of any of the Strattons' children and that the results of the medical examinations were "grossly normal" for all ten children

299. CMS and DSS records from 1/30/01 further document that all ten of the Strattons' children were in "good health."

### **Stratton Family Denied All Due Process**

300. After kidnapping the Strattons' ten children, Mecklenburg County child traffickers perpetrated on the Stratton family the extrinsic fraud child trafficking scheme as outlined in herein on the Stratton family..

301. The Stratton parents and children have been denied all pre-deprivation and post-deprivation due process.

302. Plaintiff and his wife were given the fake and fraudulent Mecklenburg County documents as outlined herein.

303. Plaintiff and his wife were given the fake and fraudulent "Juvenile Summons" falsely telling them the "seven day hearing" was just "to appoint counsel" and "set a date for hearing."

304. Plaintiff and his wife never received the § 7B-406 mandated AOC summons.

305. When Jack and Kathy Stratton arrived for the alleged "hearing to appoint counsel" they were approached by attorneys" Susan Waller (now Waller-Ramos) of the Bush and Powers Law Firm and Margaret Markey.

306. Waller was sent by William Powers, who had been allegedly "appointed" to Plaintiff Jack Stratton. Markey was allegedly "appointed" to Kathy Stratton.

307. The Strattons told the attorneys they wanted to fight the false allegations in the DSS petition. Waller and Markey told the Strattons that "this is not the time for that" and "this hearing is just to appoint attorneys."

308. At the "hearing," Plaintiff Jack Stratton stood up and asked to fight the false charges. Defendant Judge Elizabeth Miller (now Killegrew) told Plaintiff "this is not the time for that."

309. The Strattons never had the hearing mandated by GS § 7B-506.

310. Plaintiff later obtained the fraudulent "Initial (7-Day) Order" falsely claiming he and his

wife had “consented to the nonsecure custody.”

311. **Plaintiff and his wife never consented to the state holding their children.**

312. **Plaintiff and his wife would never under any circumstances “consent” to the state holding any of their children.**

313. The Strattons were not even aware of the additional mandated NCGS § 7B-506(e) hearings and the hearings never took place, yet the children continued to be held.

314. As of the filing of this complaint, the Strattons’ ten children continue be held in violation of NCGS § 7B-506(a) which states that “no juvenile shall be held....” without the hearing.

315. **NO TESTIMONY OR EVIDENCE WAS EVER GIVEN OR PRESENTED ANYWHERE BY ANYONE TO JUSTIFY THE SEIZURE OF JACK AND KATHY STRATTON’S TEN CHILDREN. THE CHILDREN WERE SEIZED AND CONTINUE TO BE HELD BY THE ENTERPRISE WITHOUT ANY LEGAL AUTHORITY (STATUTORY DEFINITION OF KIDNAPPING).**

#### **Stratton Child Hostages Used to Extort Parents**

316. To cover their illegal seizure of the Stratton children, the child traffickers attempted to get the parents to sign a “Dependency Mediation Agreement.”

317. None of the ten Stratton children have ever at any time been legally “dependent.”

318. Plaintiff Jack Stratton made it very clear at all times that he was not going to sign the document, but that he wanted a trial to expose the crimes of the DSS in kidnapping his children.

319. On March 12, 2001 Defendant Judge Miller (acting without jurisdiction) threatened five separate times to put Plaintiff Jack Stratton in jail if he refused to sign the “Dependency Mediation Agreement.”

320. Plaintiff steadfastly refused to sign. Plaintiff told Miller repeatedly he did not agree with the document and that he wanted a trial.

321. Defendant DSS Attorney stood up and declared in hostile tones "If Mr. Stratton wants a trial, we'll just have to hold his children another six months. We'll be glad to do that."

322. A "recess" was then called. Jack and Kathy Stratton went into the hallway with their (conspirator) "court appointed attorneys" Defendants Rick Lail and Margaret Markey.

323. Markey told the Strattons that if (Plaintiff) Jack Stratton would go back in and sign the "Dependency Mediation Agreement" Markey would get his children back that very day.

324. Plaintiff began to think about Wade's threat to hold the children for six months vs. Markey's declaration that she would get the children back that very day.

325. Plaintiff, desperate to get his children back, went back into the hearing and signed the document. The children were never returned.

326. Plaintiff states unequivocally that he was the victim of extortion and the only reason he signed the document was because of the fraudulent misrepresentations made to him by Markey and Lail that he would get his children back that day if he signed.

### **Isolation, Torture, and Brainwashing of the Children**

327. After being seized from their home in Gaston County, the eight youngest children were taken to a remote wooded area where they were terrorized, tortured, drugged, and sexually molested.

328. The child traffickers also subjected the children to a program of systematic psychological torture and brainwashing designed to alienate the children from their parents, "break them" psychologically, and divest them of their Christian beliefs.

329. Child and family Development, Robert Faucette, Jennifer Hartwig-Lindstrom, Southeastern Psychological Associates, Stephen Strzelecki, Thompson Child and family Focus, Vanessa Warren, Baheerah Muwwakkil, and Stacy Chatman were all paid large sums of money



by the DSS to: (a) conduct a systematic campaign of psychological torture and brainwashing against the Stratton children; (b) systematically alienate the children from their parents and their previous belief system; and (c) “break” the children psychologically and then “reassemble” their personalities into the image desired by the rabid DSS feminists; (d) purge the girls from their previous natural desire to be mothers and instill a selfish feminist belief system in them (e) purge the children from their natural desire to go back to their parents; and (f) put the children in public schools to corrupt their morals and values and destroy their personalities as inculcated in them by their parents.

330. All of the above was done illegally, against the will of the parents and the children, and without any parental consent.

331. The brutal program against the Stratton children mirrored the atrocities Defendant Richard Jacobsen had perpetrated against eight year old Alicia Wade in San Diego.

332. On June 28, 2001 the child traffickers completely cut the Strattons off from their ten children to facilitate the brainwashing process and to prevent the children from revealing any more facts about the children being sexual molested.

### **THE SECOND KIDNAPPING OF SPENCER STRATTON**

333. On January 14, 2002, the Strattons’ oldest son Spencer turned 18.

334. Mecklenburg County continued to hold Spencer without any paperwork whatsoever.

335. Plaintiff Jack Stratton and his wife went to Metro School, a satellite of the Charlotte-Mecklenburg school system in Charlotte, to get his son.

336. Spencer wanted to come home with his dad, but Metro School social worker Ira Chase kidnapped Spencer and held him against his will on a school bus.

337. Plaintiff called the Charlotte-Mecklenburg police and reported the kidnapping.



338. While Plaintiff was reporting the kidnapping, Chase hid Spencer somewhere inside Metro school and continued to hold h fun against his will.

339. Four Charlotte-Mecklenburg police officers and a detective arrived in response to Plaintiff's call. Plaintiff told them about the kidnapping of his son and demanded action.

340. The four police officers and the detective refused to do anything about the kidnapping and instead began to verbally berate and attack Plaintiff.

341. At the very time Spencer was being held against his will, (Defendants) Mecklenburg School Board Attorney Michelle Morris, DSS Attorney Tyrone Wade, and Mecklenburg County District Attorney Peter Gilchrist were in telephone contact and were conspiring to hold Spencer until they could manufacture "guardianship" documents on Spencer that afternoon

342. Plaintiff left Metro and went to Peter Gilchrist's office demanding action to stop the kidnapping. Gilchrist refused to come out or to act to prevent the kidnapping, and his subordinates told Plaintiff he would have to file a complaint with the police.

343. Plaintiff went to the Charlotte-Mecklenburg Police Department and attempted to file a kidnapping complaint. The police refused to take the complaint and ordered Plaintiff out of the building.

344. Plaintiff then demanded to file a complaint against the police for refusing to take Plaintiff's criminal complaint. The police refused to allow Plaintiff to file a complaint against any police officer or anyone else.

345. Plaintiff's son continued to be held against his will in an undisclosed location.

346. In 2005, Plaintiff attempted to obtain the police reports from the incident but the police department refused to give them to him.

347. Plaintiff sent affidavits to each individual member of the Charlotte City Council and to

City Attorney McCarley and demanding the file, including the police reports, relating to the kidnapping. The City of Charlotte and McCarley have yet to produce the files.

348. On February 22, 2002 Spencer Stratton was returned to his parents but it was declared that he and his parents had no legal rights (and therefore he could not sue his kidnappers and tormentors).

349. When Spencer was returned, he had been physically starved and abused so badly, he was virtually unrecognizable to family and friends.

**Clerk of Court Martha Curren at the Center of Mecklenburg County Child Trafficking**

350. Mecklenburg County Clerk of Court Martha Curren is joined in three critical elements of the county's child trafficking enterprise: (a) She oversees the fraudulent juvenile documents used by the Enterprise to steal children; (b) She controls all the "adoptions" of the stolen children; (c) She controls and uses the "Guardianship" program to protect and cover up the Enterprise by continuing to hold the child victims after they turn 18 so that they have no legal redress for the kidnappings, sexual abuse, and other atrocities perpetrated against them.

351. On October 1, 2003 the Strattons' second oldest son Isaiah turned 18.

352. Isaiah had been willfully and deliberately placed in two foster homes and repeatedly molested in DSS foster homes for over a year with the full knowledge and consent of the child traffickers, including Martha Curren and the Mecklenburg County DSS.

353. Curren and her co-conspirators continued without jurisdiction to hold Isaiah in state custody for another year, thereby preventing any investigation into his kidnapping and the repeated torture and sexual molestation he suffered for over a year in two foster homes.

354. In late 2004, Plaintiff Jack Stratton and his son Isaiah left the state.

355. No arrest order was ever issued for Jack Stratton's even though:

(a) Jack Stratton allegedly had no legal custody (which would allegedly meet the federal statutory definition of a “kidnapping”)

(b) Jack Stratton and Isaiah Stratton went to Walter Jones’ congressional office in Washington, DC and met with his staff immediately after leaving North Carolina.

(c) On January 5, 2005 Jack Stratton came back to Mecklenburg County without Isaiah and held a press conference in the Charlotte Mecklenburg Government Center with Sheriff’s deputies watching.

(d) After returning to Mecklenburg County without Isaiah, Jack Stratton repeatedly went on television before the Mecklenburg County Commission, demanding to be arrested so he could have a trial and demanding to take an FBI polygraph test.

(e) After returning to Mecklenburg County without Isaiah, Jack Stratton went to the Charlotte FBI office and spoke with agent Julia Muller. When Muller asked where Isaiah and Plaintiff’s wife were, Plaintiff told her they were in Missouri and left the FBI office without being arrested or even questioned.

**CHILD KIDNAPPERS HOLD JACK AND KATHY STRATTON’S TEN CHILDREN  
HOSTAGE AND DEMAND STRATTONS RENOUNCE THEIR CHRISTIAN  
RELIGIOUS BELIEFS OR LOSE THEIR CHILDREN**

356. Plaintiff Jack Stratton and his wife Kathy are Christians who practice Biblical beliefs, including God’s command found in the Bible at Ephesians 5: 22-24:

“Wives, submit yourselves unto your own husbands, as unto the Lord. For the husband is the head of the wife, even as Christ is the head of the church: and he is the saviour of the body. Therefore as the church is subject unto Christ, so *let* the wives *be* to their own husbands in every thing.”

357. After Defendants kidnapped Jack and Kathy Stratton’s ten children and held them as hostages in 2001, Jack Stratton was “ordered” by Defendant Elizabeth Miller-Killebrew and her co-conspirators to renounce his Christian religious beliefs and practices, enter into the NOVA state feminist re-education program, and embrace (the new state religion of) feminism.

358. Defendants ordered Kathy Stratton that in order to get her children back, she would have to renounce her Christian Biblical beliefs and practices and **DIVORCE HER HUSBAND.**

**THE SATANIC CONSPIRACY TO ENSLAVE MANKIND**

359. The Rothschild-Rockefeller-Illuminati-Federal Reserve-New World Order conspiracy has secretly replaced America's Constitutional form of government with a new form of government designed to enslave the American people from birth.

360. The old, Constitutional form of government consisted of three branches: (1) Executive, (2) Legislative, and (3) Judicial.

361. The new Luciferian slavery consists of three new branches: (1) International Banks and Corporations, (2) Government, and (3) Non-Profits.

362. Government power is being transferred to private non-profit fronts under the guise of "privatizing services."

363. By appearing to diffuse government power into private non-profits and business, the conspirators hide the fact that they are instituting a worldwide police state.

364. The new world order slave plantation is predicated on constructively seizing every child from birth. The Rothschilds and Rockefellers have implemented a worldwide plot allegedly predicated on "the science of brain development." **The scheme equates parental child rearing philosophy with child abuse (brain damage) and mandates universal and comprehensive state intervention for all children from birth.**

365. The conspiracy uses language such as "early childhood development", "early childhood education", and "start school ready to learn." All of these phrases are universal code language for the implementation of the Luciferian conspiracy through the United Nations Convention on the Rights of the Child, the complete destruction of the family and parental rights, and the new world order takeover of children from birth.

366. In the United States the Rothschild-Rockefeller child stealing scheme is directed from the top by the Federal Reserve Bank and implemented across America through local governments

and the criminal front operation known as UNITED WAY.

### **United Nations Convention on the Rights of the Child**

367. The Illuminati conspiracy includes a plot to control all children from birth.

368. On November 20, 1989 the UN ratified the "United Nations Convention on the Rights of the Child" (UNCRC"). The document is a binding legal document that usurps parental rights and turns every child born on planet earth over to a world government.

369. The United States and Somalia are the only nations left who have not signed the convention. The people of the United States have been violently opposed to the UNCRC and the usurpation of their parental rights.

370. Circumventing the will of the people and the U.S. Constitution and Bill of Rights, the conspirators and their agents are secretly implementing the UNCRC in the United States. This is done through the World Bank, the U.S. Federal Reserve Banks, the Rockefeller Foundations, and the United Nations down through the Harvard Center on the Developing Child, United Way, America's Promise Children's Alliance, the National Governor's Association, the National Conference of State Legislatures, the National League of Cities, National Council of Juvenile and Family Court Judges, the National CASA Association, and hundreds of thousands of non-profit foundations and "children's rights groups across the United States in every local community.

371. All "juvenile courts" and "family courts" in the United States are operating under the UNCRC, each using the local United Way as a front for the criminal Enterprise.

372. "Juvenile and family court judges" across the nation are trained in the implementation of the UNCRC by the National Council of Juvenile and Family Court Judges in Reno, Nevada.

373. The National CASA Association in Seattle, Washington is a co-conspirator in training

“guardian ad litem” in implementing the UNCRC.

### **EXPOSING THE MECKLENBURG COUNTY CELL OF THE INTERNATIONAL LUCIFERIAN CHILD TRAFFICKING CONSPIRACY**

374. At the top of the Mecklenburg County child trafficking Enterprise is the Federal Reserve Bank of Richmond, Bank of America, Bank of America Chair Hugh McColl, the Foundation for the Carolinas, and the United Way of Central Carolinas. McColl is a member of Rockefeller’s Trilateral Commission and a driving force behind child trafficking in Mecklenburg County.

375. The United Way of Central Carolinas, as all local United Ways, takes its directives from the Rockefeller Foundations, operating as a front for a shadow criminal government and a front for a covert child trafficking operation.

376. The “new” covert government is a self-described “collaborative partnership” between municipal government, banks and corporations, and non-profits agencies.

377. The “United Agenda for Children” is described as “an unprecedented community collaboration” between the government, corporations, and non-profits and states the following:

Under the guidance of The Lee Institute, representatives of more than 40 non-profit organizations and public institutions including the Children’s Alliance, the business community, Charlotte-Mecklenburg Schools and community groups have formed the United Agenda for Children Coalition. The coalition agreed to a three year process with an overall goal: the implementation of a united action plan to ensure all children in Mecklenburg County are healthy, safe, and well-educated.”

378. The “United Agenda for Children” is declared to be for **all children birth to 21**.

379. Listed as “partners” in the “United Agenda for Children” is the Mecklenburg County Department of Social Services and the Mecklenburg County Guardian Ad Litem Program, entities that are mandated by statute to be independent of each other.

380. The City of Charlotte is a United Agenda for Children “partner.”

381. “United Agenda” DSS partner Thompson Child and Family Focus is an adoption and



“children’s mental health” agency that makes millions of dollars in profit from assisting DSS in the kidnapping of children, including Plaintiff’s ten children.

382. The husband of NC State Representative, former County Commissioner, and DSS co-conspirator Ruth Samuelson is on the Board of Thompson Child and Family Focus.

383. “United Agenda” DSS partner United Family Services has an official “memorandum of understanding” memorializing their partnership in seizing children of Christians for their “patriarchal” religious beliefs and practices. In return, UFS pockets millions of dollars in fat contracts paid with taxpayer money.

384. Plaintiff Jack Stratton has in his possession a Mecklenburg County DSS petition used to seize a woman’s four children. The petition specifically states that the woman’s children were removed by the DSS because she applied to a United Way agency for help with her electric bill.

385. The Charlotte based Foundation for the Carolinas one of the largest foundations in the United States and is the major conspiratorial force behind the “United Agenda for Children.” The Foundation admits on its website that the “agenda” is to explore a “*new decision-making model for the community*” (as opposed to the “old decision making model” of elected government officials, accountable to the people, making the decisions):

“Seeking ways to raise the profile of children’s issues, create a community vision concerning these issues and also explore a new decision-making model for the community, the Foundation collaborated with the Lee Institute to create a United Agenda for Children town hall meeting in 2004.”

386. The Foundation states on its website that the “United Agenda for Children” will “*ensure a positive future for all children in Mecklenburg County*” and will “*hold parents accountable.*”

#### **Consummate Evil: Brett Loftis and the Council for Children’s Rights**

387. The Council for Children's Rights is a United Way criminal front set up by the Mecklenburg County child trafficking enterprise. It is the result of a merger between the Council for Children



County child trafficking enterprise. It is the result of a merger between the Council for Children and the Children's Law Center.

388. The Director of the Council for Children's Rights is Brett Loftis.

389. Loftis and Council for Children's Rights attorneys are officially attached to juvenile cases by the Mecklenburg County Courts and function as state actors.

390. Loftis and the Council for Children's Rights are fully joined in the Mecklenburg County child trafficking scheme and was a participant in all of the extrinsic fraud heretofore set forth, including but not limited to using the aforementioned facially fraudulent "Juvenile Summons" and other fake court documents to kidnap children.

391. Loftis and the Council for Children's rights need the bodies of little children in order to funnel money to their organization. They obtain their child victims through the DSS child trafficking and child kidnapping operation.

392. Council for Children's Rights Director Brett Loftis was a conspirator in the kidnapping, torture, and sexual molestation of Plaintiff Jack Stratton's children.

393. Loftis is directly responsible for the repeated sexual molestation of Plaintiff Jack Stratton's children, including Plaintiff's five year old daughter, and the subsequent cover-up.

394. Loftis oversaw and was responsible for the malicious and systematic brainwashing and psychological torture of the Strattons' ten children.

**MECKLENBURG COUNTY JUVENILE JUDGES MEET SECRETLY WITH DSS,  
GUARDIAN AD LITEMS, AND NON-PROFITS TO PLOT AGAINST PARENTS**

**"The Children's Alliance"**

395. "The Children's Alliance" is another secret back room conspiratorial group in which the Mecklenburg County Juvenile Court Judges Meet Secretly with the DSS, the Guardian ad Litem to plot and conspire against parents.

profits joined in the Mecklenburg County child trafficking enterprise. Every non profit "partner" in the Children's Alliance makes money from the state seizure of children.

397. The Children's Alliance is also a "partner" in the "United Agenda for Children."

398. Plaintiff has filed numerous affidavits demanding "open records" on The Children's Alliance and the United Agenda for Children from Mecklenburg County and City of Charlotte officials. Officials never responded and refuse to turn over any records on the groups.

#### **Conspiracy in Mecklenburg Juvenile Justice and Prevention Counsel Meetings**

399. A meeting was held on February 25, 2002 under the auspices of the Mecklenburg County Juvenile Crime Prevention Council.

400. The minutes of that meeting show Brett Loftis and other non-profits asking the juvenile court judges what they can do to force parents to enter into their programs (compelled contracts). The judges show the non-profits how to file motions to put the parents in jail for not signing the contracts.

#### **Loftis, Trosch, and Portwood, and Boyd Secret "Collaboration"**

401. On August 17-20, 2010 the American Psychological Association held its annual convention in San Francisco, California.

402. Brett Loftis, Mecklenburg County Juvenile Judge Louis Trosch, Sharon Portwood, of the UNCC Institute for Social Capital, and UNCC Social Work Professor Suzanne Boyd traveled together to San Francisco and gave a presentation for the convention entitled *Effective Coordination of Community-Based Strategies for Serving Children and Youth*.

403. Loftis collects millions of dollars for his non-profit "Council for Children's Rights" by falsely telling donors and the public that he and his group are "independent watch dogs" of the Mecklenburg Court System and the DSS,

### **The Secret Child Database**

404. The “UNCC Institute for Social Capital” is one of the “partners” in the “United Agenda for Children” and “The Children’s Alliance.”

In furtherance of the child trafficking conspiracy, the Institute for Social Capital is currently building a massive secret database on every child in Mecklenburg County.

405. On the Institute’s Board are: Director Sharon Portwood, United Way of Central Carolinas CEO Jane McIntire, Mecklenburg County Juvenile Court Judge Louis Trosch, Council for Children’s Rights Board member William Underwood, Levine Children’s Hospital chief medical officer Leonard Feld, Major Diego Anselmo of the Charlotte-Mecklenburg Police Department, Charlotte-Mecklenburg School Superintendant Peter Gorman, Carolinas Medical Center Senior Vice President James McDeavitt, Mecklenburg County General Manager for Health and Safety Janice Allen Jackson, and Jan Thompson, Director of Inmate Services for the Mecklenburg County Sheriff’s Office.

406. Judge Louis Trosch is a member of the National Council of Juvenile and Family Court Judges and travels around the country teaching municipalities how to have “collaborative partnerships” between juvenile judges, DSS, Guardian ad litem, non-profits, and others.

### **America’s Promise Alliance and the City of Charlotte**

407. Americas Promise Alliance (“APA”) was allegedly started by General Colin Powell, a Council on Foreign Relations and Satanic Bohemian Grove member and Rockefeller puppet.

408. APA is the largest conspiratorial child trafficking non-profit in the country outside of United Way, with 420 allied organizations, a large percentage of them extremely powerful and Influential.

409. The stated purpose of APA is to further the “collaboration” between governments, non-

profits, corporations, and “the faith community” to “ensure” that all children “receive the five promises” (code language for the state conspiracy to take over child rearing from birth).

410. The City of Charlotte has “adopted” the APA conspiracy and was named one of the top one hundred cities in America for implementing the APA agenda.

411. Anthony Foxx, recently elected Mayor of Charlotte, was backed in his campaign by international banker and Trilateral Commission member Hugh McColl. A picture of McColl with his arm around Foxx was prominent on the Foxx website.

412. When asked what his number one priority was Foxx stated it was for all children to “start school ready to learn” (universal code language for child traffickers across the United States, meaning the state will constructively seize all children from their parents at birth).

413. The United Way, Council for Children’s Rights, America’s Promise, Foundation for the Carolinas, Mecklenburg County, the City of Charlotte, and numerous other co-conspirator entities in Charlotte-Mecklenburg are joined in the Rothschild-Rockefeller-Federal Reserve Satanic conspiracy to destroy the family and enslave mankind.

**HOW THE CHILD TRAFFICKERS USE CAPTA, THE FULL FAITH AND CREDIT  
CLAUSE, “DOMESTIC RELATIONS” ABSTENTION, AND “ROOKER- FELDMAN”  
TO KIDNAP CHILDREN AND PROTECT THE CRIMINAL ENTERPRISE**

414. The child traffickers in the United States have generated laws and constructed their conspiracy around those laws so as to make it impossible for parents and children to escape.

415. The conspirators use the Child Abuse Prevention and Treatment Act (CAPTA) and CPS agencies in all 50 states to seize children and hold them hostage. Parents are forced into closed and secretive state “juvenile court hearings” to attempt to get their children back.

416. Under CAPTA and the CPS system, after children are seized parents cannot refuse to attend the state “juvenile court hearings.” If they do the conspirators will declare that the parents

“willfully left their children in foster care” and the children will be “adopted out” to strangers. In addition, the parents will be held in “criminal contempt” and put in jail.

417. After the conspirators use their child hostages and CAPTA to extort families into their closed state juvenile hearings, they invoke legal doctrines such as the Full Faith and Credit Clause, “Domestic Relations” Abstention, and Rooker-Feldman to prevent the families from obtaining any redress in the federal courts.

418. The above “catch 22” situation creates a closed and hermetically sealed environment for the child traffickers to steal children, putting families at the absolute mercy of the criminals.

419. It cannot be overemphasized that every invocation by “CPS” of the above legal doctrines constitutes a predicate criminal act in furtherance of the conspiracy.

#### **CAPTA AND CPS FAIL THE “COMPELLING STATE INTEREST” TEST**

420. John Walsh of “America’s Most Wanted” (whose child was murdered) has documented that children are eleven times more likely to be abused in foster homes than in the general population. Therefore, if all CPS agencies and programs were immediately shut down, child abuse would immediately drop by 1100% and the taxpayers would save billions of dollars.

421. Furthermore, CAPTA and all its derivatives in the implementation of “child protective services” when exercised on Plaintiffs and like individuals fail the “compelling state interest” test because there is no compelling state interest in seizing children from parents, nor is that the least restrictive means to protect children.

422. The “compelling state interest” in protecting children can only be met by removing the abuser and not the victim.

#### **TIME TOLLED FOR EXTRINSIC FRAUD AND CONTINUING WRONGS PERPETRATED IN FURTHERANCE OF A CONTINUING CONSPIRACY**

423. Any alleged statute of limitations defenses proffered by Defendants is tolled due to

Defendants' massive extrinsic fraud and because Plaintiffs and their family are victims of continuing wrongs perpetrated in furtherance of a continuing conspiracy.

### **CONSTITUTIONAL CHALLENGES**

424. Paragraphs 1-416 are incorporated and re-alleged as if fully set forth herein.

425. Plaintiffs challenge the constitutionality of CAPTA and its progeny in that CAPTA violates the First, Fourth, Sixth, and Fourteenth Amendments to the United States Constitution, facially and as applied, as set forth herein.

426. CAPTA as implemented in the State of North Carolina also violates the North Carolina Constitution Article I, §18 which mandates that "all courts shall be open."

427. Plaintiffs challenge the constitutionality of the North Carolina Juvenile Code [North Carolina General Statutes, Chapter 7B], facially and as applied, in that it violates the First, Fourth, Sixth, and Fourteenth Amendments to the United States Constitution, as set forth herein.

428. The Juvenile Code violates the North Carolina Constitution Article I, §18.

429. Plaintiffs challenge NCGS Chapter 35A [Guardianship], as applied in that it violates the First and Fourteenth Amendments to the United States Constitution, as set forth herein.

430. Plaintiffs challenge all federal and state "domestic violence" statutes, programs, policies, and procedures including but not limited to the Violence Against Women Act, facially and as applied in that they violate the First and Fourteenth Amendments to the United States Constitutions.

### **Plaintiffs' Claims Re. Michael Schmidt**

431. All Defendants including Plaintiff Jack Stratton's former attorney Michael Schmidt have willfully and maliciously conspired to use the fake and fraudulent Mecklenburg County Court documents heretofore outlined in this complaint and have acted against Plaintiffs in their use.

432. All Defendants including Schmidt have willfully and maliciously conspired to cover up the sexual molestation of Plaintiff Jack Stratton's children.

433. All Defendants including Schmidt have acted in agreement, concert, and conspiracy against Plaintiffs in furtherance of the child trafficking Enterprise, and are responsible for all the acts of their co-conspirators.

434. In addition, Defendant Michael Schmidt is perpetrating and ongoing wrong against Plaintiffs by repeatedly refusing to turn over Plaintiff Jack Stratton's full case file containing evidence that could help Plaintiff obtain justice.

435. Plaintiff Jack Stratton alleges Schmidt's refusal is a predicate act to cover up the conspiracy and further the Enterprise to which Schmidt is joined in his own self-interest.

436. SCHMIDT CONTINUES AS OF THE FILING OF THIS COMPLAINT TO PERPETRATE AND ONGOING WRONG TO THE HARM, DAMAGE, AND DETRIMENT OF PLAINTIFF AND PLAINTIFF'S FAMILY.

#### **CLAIM I.**

#### **42 USC § 1983 Conspiracy to Violate Rights**

437. Paragraphs 1-436 are incorporated and re-alleged as if fully set forth herein.

438. Defendants are acting in continuing agreement, combination, and conspiracy to violate Plaintiff Jack Stratton and Plaintiff Solomon Stratton's clearly established rights as guaranteed and protected by the U.S. Constitution, as set forth in this complaint and as follows:

#### **FIRST AMENDMENT RIGHTS:**

- (a) Plaintiffs' right to practice their Biblical Christian religious beliefs, including home schooling.
- (b) Plaintiffs' right to privacy.
- (c) Plaintiffs' right to freely associate with their family.
- (d) Plaintiffs' right of access to the courts.
- (e) Plaintiffs' right of redress to the government.
- (f) Plaintiffs' right to freedom of speech.



**FOURTH AMENDMENT RIGHTS:**

- (a) Plaintiffs' right to liberty.
- (b) Plaintiff's right to be free from unreasonable searches and seizures.
- (c) Plaintiffs' right to the exclusion of illegally seized evidence and its derivatives ("fruit of the poisonous tree").
- (d) Plaintiffs' right to privacy.

**FIFTH AMENDMENT RIGHTS:**

- (a) Plaintiffs' right to be free from self-incrimination.

**SIXTH AMENDMENT RIGHTS:**

- (a) Plaintiffs' right to speedy trial
- (b) Plaintiffs' right to trial by jury
- (c) Plaintiffs' right to be informed of the nature and cause of accusations against him.
- (d) Plaintiffs' right to confront witnesses against him.
- (e) Plaintiffs' right to compel witnesses in his favor.
- (f) Plaintiffs' right to counsel.

**EIGHTH AMENDMENT RIGHTS:**

- (a) Plaintiffs' right to be free from cruel and unusual punishment.

**THIRTEENTH AMENDMENT RIGHTS:**

- (a) Plaintiffs' right to be free from slavery and involuntary servitude.

**FOURTEENTH AMENDMENT RIGHTS:**

- (a) Plaintiff Jack Stratton's right to the care, custody, and companionship of his children and grandchildren and Plaintiff Solomon Stratton's right to be with his intact family.
- (c) Plaintiffs' right to substantive due process.
- (d) Plaintiffs' right to procedural due process.
- (e) Plaintiffs' right to equal protection.

**CLAIM II.**

**42 USC § 1985 Conspiracy to Violate Rights  
(Motivated by Race, Religion, and Sex)**

439. Paragraphs 1-438 are incorporated and re-alleged as if fully set forth herein.

440. Defendants are acting in continuing agreement, combination, and conspiracy to violate Plaintiff Jack Stratton and Plaintiff Solomon Stratton's clearly established rights as guaranteed

and protected by the U.S. Constitution based on Plaintiffs' religious beliefs, Plaintiff's race, and Plaintiff Jack Stratton's sex, as set forth in this complaint and as follows:

- (a) Defendants are perpetrating religious genocide against Plaintiffs and their family by willfully, maliciously, and illegally using state power to destroy the family based on the family's patriarchal Biblical beliefs and practices.
- (b) Defendants are perpetrating racial genocide against Plaintiffs and their family by willfully, maliciously, and illegally using state power to destroy the family based on the family's interracial and bi-racial identity.
- (c) Defendants have acted in combination and concert to further their conspiracy against Plaintiffs and their family through criminal acts of violence and other criminal acts.
- (d) Defendants, especially using feminists in state and federal government, have misused state power to enslave and persecute Plaintiffs and their family in retaliation for the family's religious beliefs and in pursuit of the abusers' feminist agenda.

**CLAIM III.**  
**18 USC § 1964, et seq. Violations**  
**(RICO)**

441. Paragraphs 1-440 are incorporated and re-alleged as if fully set forth herein.

442. Defendants are acting in continuing agreement, combination, and conspiracy against Plaintiffs' in furtherance of an organized association in fact international criminal RICO Enterprise. Those at the top of the Enterprise, along with some at the middle and lower levels, are Luciferians motivated by their desire to destroy Biblical Christianity and enslave the human race in a Satanic one world government.

443. Plaintiffs have never been involved in any "government" case, CPS or otherwise. Instead Plaintiffs and their family are victims of an Enterprise engaged in international child trafficking and seizes children for purposes of pedophilia and human child sacrifice. In Western Countries, the Enterprise through its co-conspirators in government have set up a fraudulent front they call "child protective services" ("CPS"). CPS is an Orwellian concept as the Enterprise and its CPS fronts are the worst mass child abusers and child molesters in the history of mankind.

444. Plaintiffs and their family are victims of an Enterprise that through its CPS fronts commit

heinous acts in furtherance of the Enterprise, including but not limited to child kidnapping, child torture, ritualistic child sexual molestation, drugging of children, and human child Satanic sacrifices. To carry out their worldwide conspiracy, Defendants at the top of the international Enterprise over the last 240 years have used criminal means to obtain total control of the world monetary and credit system, to take over the governments of the world, and to set up hundreds of thousands of subordinate criminal enterprises acting within federal, state, and local governments and non-profits organizations.

445. Not all Defendants named in this complaint are overt Satanists. Defendants are acting under various motivations, all in their own self interest and all damaging to Plaintiffs, their family, and the whole of civil society. Defendant motivations include, but are not limited to:

- (a) Radical lesbians and feminists who obtain government positions as judges, social workers, and others for the express purpose of misusing government power to “destroy the patriarchy.”
- (b) Pedophiles, homosexuals, and other sexual deviates who obtain positions within the “child protective services” system for the express purpose of using the CPS “cloak of confidentiality” to seize, hold, and sexually molest children.
- (c) Individuals within the CPS system who seize children and use them as conduits to defraud the federal and state government and embezzle funds.
- (d) Individuals who will do anything, including joining a criminal enterprise, in order to obtain or maintain their respective jobs, positions, money, status, or other personal benefits they accrue from being part of the “system.”

446. Regardless of their respective motivations, Defendants in this action continue to act in concert, combination, and conspiracy against Plaintiffs in furtherance of the criminal Enterprise. Each Defendant participates in the management and operation of the Enterprise and has committed numerous acts to maintain, expand, and protect the Enterprise. Defendants continue to profit from their illegal and tortuous conduct in furtherance of the Enterprise and unless they are restrained and brought to justice by this Court, they are certain to continue their unlawful activities into the future.

447. Defendants in order to protect and further the Enterprise have combined, agreed, and conspired to destroy Plaintiffs and Plaintiffs' family to protect the Enterprise and their own personal interests in it.

448. Defendants in order to protect and further the Enterprise they profit from have combined, agreed, and conspired to falsely and fraudulently destroy Plaintiff Jack Stratton's credibility with the public and have perpetrated numerous acts in furtherance of their conspiracy, including but not limited to:

- (a) Spending hundreds of thousands of dollars in taxpayer funds to create fraudulent "public records" against the Stratton family and then disseminating the fake records to the public and the media, both publicly, and secretly in violation of federal and state law.
- (b) Engaging in a campaign of public slander, defamation, and ridicule against Jack Stratton over public FCC airwaves (especially on WBT radio), on television, on the internet, and through the mails.
- (c) Denying the Stratton family all due process or opportunity to respond, thereby preventing the Strattons from correcting the record.

449. The actions of Defendants against Plaintiffs and Plaintiffs' family are per se willful, malicious, and carried out with evil intent.

450. Each of the Defendants is joined in and responsible for the acts of their co-conspirators in the continuing conspiracy.

451. Defendants are joined in perpetrating numerous acts of fraud and illegal concealment of records and other information to prevent Plaintiffs from exposing the Enterprise.

452. Defendants fraudulently and illegally misuse and abuse the legal process to protect the Enterprise. Defendants conspire, pre-plan, and execute the manufacture of evidence and the fraudulent use of legal doctrines such as "Rooker-Feldman" and "Domestic Relations Abstention" to protect and conceal the Enterprise from being exposed in the federal courts. These doctrines are themselves predicate criminal acts in the hands of the conspirators.

#### CLAIM IV.

**18 USC § 1595 Violations  
(Slavery, Involuntary Servitude, and Peonage)**

453. Paragraphs 1-452 are incorporated and re-alleged.as if fully set forth herein.

454. Defendants have kidnapped Plaintiff Solomon Stratton and his brothers and sisters and continue to hold the minors and the entire family including Plaintiffs in a perpetual condition of slavery and involuntary servitude, in violation of the Thirteenth Amendment to the U.S. Constitution and 18 USC § 1595 of the U.S. Code, as set forth herein.

**CLAIM V.  
Title VI Civil Rights Violations  
(42 USC § 2000d et. seq.)**

455. Paragraphs 1-454 are incorporated and re-alleged.as if fully set forth herein.

456. Defendants have violated plaintiffs' rights under Title VI of the Civil Rights Act of 1964, as set forth herein.

**CLAIM VI.  
42 USC § 2000bb, et seq. Violations  
(Religious Freedom Restoration Act)**

457. Paragraphs 1-456 are incorporated and re-alleged.as if fully set forth herein.

458. The United States Department of Health and Human Services has violated Plaintiffs' religious beliefs and practices, without cause, willfully and with malice, as set forth herein.  
Paragraphs 1-416 are incorporated and re-alleged.as if fully set forth herein.

**CLAIM VII.  
Assault and Battery**

459. Paragraphs 1-458 are incorporated and re-alleged.as if fully set forth herein.

460. All Defendants except Schmidt are guilty of assault and battery against Plaintiff Solomon Stratton by physically kidnapping him and repeatedly violating his bodily integrity and his right to move about, and subjecting him to intensive bodily examinations without his consent of the

consent of his parents.

**CLAIM VIII.**  
**Continuing Legal Malpractice**

461. Paragraphs 1-460 are incorporated and re-alleged as if fully set forth herein.

462. Defendant Schmidt is guilty of ongoing legal malpractice against Plaintiff Jack Stratton for Schmidt's continuing refusal to turn over the complete Stratton case file in order to protect and cover up for his co-conspirators, thereby causing ongoing and irreparable damage to Plaintiff and his entire family, as set forth herein.

463. Damages against Schmidt on this claim continue to accrue until he releases the file.

464. Schmidt, like all his co-conspirators, is acting willfully and with malice.

**REQUEST FOR RELIEF**

Wherefore Plaintiffs request the following relief:

- A. The Court issue declaratory relief that all orders and judgments used to kidnap and hold Plaintiff Jack Stratton's ten children are void and are vacated due to lack of jurisdiction, extrinsic fraud, fraud upon the court, and want of due process.
- B. Additional declaratory and injunctive relief to be made by motion.
- C. Damages from Defendants to each Plaintiff in the following amounts:
  - (1) United States Department of Health and Human Services: 100 million dollars in compensatory damages.
  - (2) United Way of Central Carolinas, Foundation for the Carolinas, Council for Children's Rights, Brett Loftis: 100 million dollars per Defendant in compensatory damages and 100 million dollars per Defendant in punitive damages.
  - (3) Martha Curren, David Cayer, Yvonne Mims-Evans, Elizabeth Miller-Killegrew, Margaret Sharpe, Sidney Eagles, John Martin, Martha Geer, Patricia Timmons-

Goodsen: 25 million dollars per Defendant in compensatory damages and 25 million dollars per Defendant in compensatory damages.

(4) Mecklenburg County: 500 million dollars in compensatory damages.

(5) Richard Jacobsen, Tyrone Wade, Twyla Hollingsworth, Donna Fayko, Gretchen Caldwell, Sherri Glenn, David Fee, Lisa Looby, Susan Miller, Katherine Dorminey, Robert Adden, Richard Lucy, 25 million dollars in compensatory damages and 25 million dollars in compensatory damages.

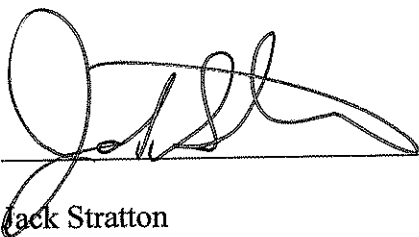
(6) Carolinas Healthcare System: 100 million dollars per Defendant in compensatory damages and 100 million dollars per Defendant in punitive damages.

(7) Michael Schmidt: One million dollars in compensatory damages and one million dollars in punitive damages.

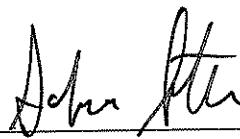
D. TRIAL BY JURY DEMANDED ON ALL ISSUES SO TRIABLE.

E. Any other relief for Plaintiffs.

This the 23<sup>rd</sup> day of September, 2010.



Jack Stratton  
PO Box 480466  
Charlotte, NC 28269  
980-621-9450



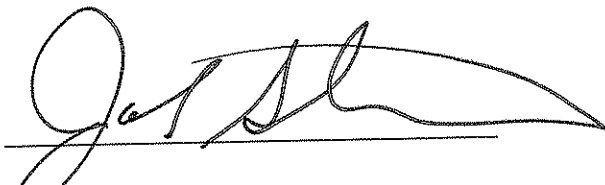
Solomon Stratton  
PO box 480466  
Charlotte, NC 28269  
980-621-9450



### VERIFICATION

I, Jack Stratton, certify under penalty of perjury that what is contained in the foregoing "Plaintiffs' First Amended Verified Complaint" is true and correct as to my own knowledge, except as to those matters based upon information and belief, and as to such matters, I believe them to be true.

Submitted under penalty of perjury this the 23<sup>rd</sup> day of September, 2010.

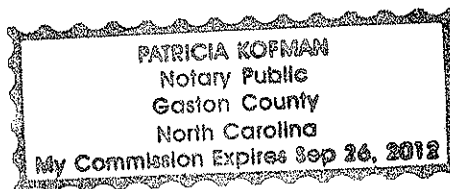


Jack Stratton  
PO Box 480466  
Charlotte, NC 28269  
980-621-9450

I certify that Jack Stratton appeared before me this, the 23<sup>rd</sup> day of September 23, 2010 in Gaston County, NC and verified this instrument.



Notary Public

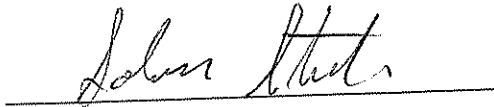


My commission expires: Sept. 26, 2012

### VERIFICATION

I, Solomon Stratton, certify under penalty of perjury that what is contained in the foregoing "Plaintiffs' First Amended Verified Complaint" is true and correct as to my own knowledge, except as to those matters based upon information and belief, and as to such matters, I believe them to be true.

Submitted under penalty of perjury this the 23<sup>rd</sup> day of September, 2010.

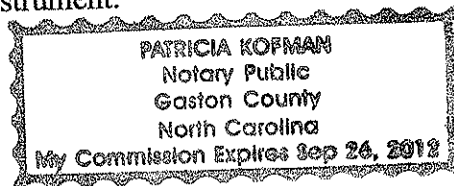


Solomon Stratton  
PO Box 480466  
Charlotte, NC 28269  
980-621-9450

I certify that Solomon Stratton appeared before me this, the 23<sup>rd</sup> day of September 23, 2010 in Gaston County, NC and verified this instrument.



Notary Public



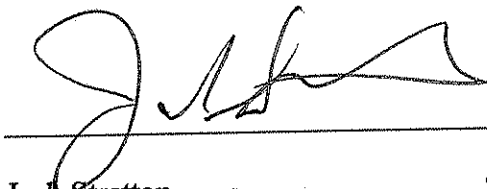
My commission expires: Sept. 26, 2012

## CERTIFICATE OF SERVICE

Plaintiffs' certify that the foregoing "Plaintiffs' First Amended Verified Complaint" was served on the following parties via US Postal Service First Class mail:

Robert Adden  
Attorney for Mecklenburg County Department of Social Services  
831 East Morehead Street, suite 630  
Charlotte, NC 28203

This the 24<sup>th</sup> day of September, 2010.



Jack Stratton  
PO Box 480466  
Charlotte, NC 28269  
980-621-9450



Solomon Stratton  
PO box 480466  
Charlotte, NC 28269  
980-621-9450